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4 SELECT COMMITTEE TO INVESTIGATE THE
5 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,
6 U.S. HOUSE OF REPRESENTATIVES,
7 WASHINGTON, D.C.

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11 DEPOSITION OF: CHRISTOPHER BARCENAS

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15 Thursday, March 10, 2022

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17 Washington, D.C.

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20 The deposition in the above matter was held via Webex, commencing at 10:04

21 a.m.

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2 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

6 THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

7

8 [REDACTED] INVESTIGATIVE COUNSEL

9 [REDACTED] PROFESSIONAL STAFF MEMBER

10 [REDACTED] INVESTIGATIVE COUNSEL

11 [REDACTED], CHIEF CLERK

12 [REDACTED] INVESTIGATIVE COUNSEL

13 [REDACTED] INVESTIGATIVE COUNSEL

14 [REDACTED] CHIEF ADMINISTRATIVE OFFICER

15 [REDACTED] SENIOR INVESTIGATIVE COUNSEL

16

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18 For THE WITNESS:

19

20 AUBREY WEBB

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2 [REDACTED] So on the record at 10:03 a.m.

3 Good morning. This is the deposition of Christopher Barcenas, conducted by the
4 House Select Committee to investigate the January 6th attack on the United States
5 Capitol pursuant to House Resolution 503.

6 This will be a staff-led deposition, though members may choose to join the call
7 and ask questions themselves.

8 At this time, I'll ask the witness to please state your full name and spell your last
9 name for the record.

10 The Witness. My name is Christopher Barcenas, last name, B-a-r-c-e-n-a-s.

11 [REDACTED] Great. And my name is [REDACTED] I'm an investigative counsel
12 with the Select Committee. With me from the Select Committee staff are [REDACTED]
13 [REDACTED] investigative counsel, [REDACTED] investigative counsel, and [REDACTED]
14 also investigative counsel.

15 There are no members present in the room. We also have [REDACTED] a senior
16 investigative counsel with us. No members are present in the Webex right now, and at
17 this time, I'll ask counsel for Mr. Barcenas to state their name for the record.

18 Mr. Webb. Good morning. Aubrey Webb, on behalf of Mr. Barcenas.

19 [REDACTED] Great. Under House deposition rules, neither the committee
20 members, nor staff may discuss the substance of the testimony today unless the
21 Committee approves release.

22 Also, under House rules, you may have your attorney present, but counsel for
23 other individuals or attorneys from other government agencies may not be, and are,
24 therefore, not present today.

25 I would also note for the record, that what has been previously marked as exhibit

1 1, is the Select Committee's February 10, 2022, subpoena for Mr. Christopher Barcenas.
2 The House deposition rules are included in that exhibit.

3 As I mentioned earlier, off the record, there's an official reporter transcribing our
4 conversation today. So Mr. Barcenas, if you can just wait until I finish my questions
5 before you start your answer. It's obviously hard for the court reporters to transcribe
6 two people speaking at once, and so we'll try to make their job a little bit easier today.

7 The Witness. Okay.

8 [REDACTED] And then along the same lines, just make sure when you're
9 answering questions, that you use a verbal response instead of a head shake. A yes or
10 no or some appropriate response is always going to be better. And I might remind you
11 once or twice through the deposition to use that sort of response. Does that make
12 sense?

13 The Witness. Makes sense.

14 [REDACTED] And then today, I would just ask that you provide complete answers
15 based on your best recollection. If a question is not clear, just ask me to clarify or
16 restate the question. And if you don't know the answer to a question, just simply say so.

17 The Witness. Okay.

18 [REDACTED] You may refuse to answer a question to preserve a privilege
19 recognized by the Select Committee. Such privileges including the Fifth Amendment
20 privilege against compulsory self-incrimination.

21 If you refuse to answer a question based on a privilege, staff may either proceed
22 with the deposition or seek a ruling from the chairman to the objection. If the chairman
23 overrules such an objection, you'll be required to answer the question.

24 I'll also remind you that it's unlawful -- and we provide this warning to everybody,
25 but unlawful to deliberately provide false information to Congress. Providing false

1 information could result from criminal penalties for perjury and/or providing false
2 statements under 18 U.S.C. 1001, which makes it illegal to provide a false statement to a
3 congressional investigator like myself or the other individuals that I introduced on this
4 call. Does that make sense to you?

5 The Witness. Yeah, that makes sense.

6 [REDACTED] And then also, as I noted, we are congressional investigators, so I just
7 say that to emphasize that this is not a criminal investigation. These proceedings are
8 separate and distinct from any criminal proceedings by the Department of Justice. We
9 are not working in partnership with them. We're not involved in each other's processes.
10 Do you understand that?

11 The Witness. I understand.

12 [REDACTED] Okay. And then just throughout the deposition today -- obviously
13 we'll be talking for some time -- if you need a break at any point just for the bathroom,
14 for water, or if you need to talk to Mr. Webb, let me know. I'm happy to turn all the
15 cameras off and mics and let you do that. So just let me know if you need one of those
16 breaks.

17 The Witness. Okay.

18 [REDACTED] And then finally I'll note, I'll mostly be leading this conversation and
19 asking most of the questions, but at different times, some of the other staff members
20 that I introduced earlier might jump in to ask some follow-up questions or ask some
21 questions of their own.

22 And then kind of with those ground rules laid out, because this deposition is under
23 oath, would you please raise your right hand to be sworn.

24 The Reporter. Do you solemnly declare and affirm under the penalty of perjury
25 that the testimony you are about to give will be the truth, the whole truth, and nothing

1 but the truth?

2 The Witness. Yes.

3 EXAMINATION

4

BY [REDACTED]

5 Q Great. Then if we could just start with a little bit of background
6 information about you. Can you tell me where you grew up?

7 A Sure, I grew up in Broward County, Cooper City.

8 Q Okay. And where are you currently living?

9 A I live in Coral Gables, Miami, Florida.

10 Q Great. And do you live with anybody, or are you married?

11 A No. I live by myself. I'm not married.

12 Q And then can you just kind of quickly run me through your educational
13 background up through the highest level of education?

14 A Yeah. I have a master's degree from University of Miami.

15 Q Okay. And are you currently employed, Mr. Barcenas?

16 A Yes, I'm employed.

17 Q Okay. And what do you do?

18 A I'm in real estate -- a real estate agent.

19 Q Okay. And have you had any other careers, or have you always been in real
20 estate?

21 A I've done other jobs, you know, manager at a department store, and stuff
22 like that.

23 Q Okay. Currently is real estate your only source of income?

24 A No. I work another job. I work at a hotel as well.

25 Q Okay. And what is that job?

1 A Just helping out at night. It's like a night -- night audit.

2 Q Okay. And then we'll talk about, obviously, your involvement in these
3 organizations later, but do you receive any income or -- well, just, do you receive any
4 income from your involvement with the Proud Boys?

5 A Not at all.

6 Q And I understand you also are involved with, or the leader of a group called
7 Floridians First. Is that right?

8 A Yeah. I -- I'm involved with that, yes.

9 Q Okay. And any income from that organization?

10 A No.

11 Q How about any government service, either Federal, State, or local
12 government, have you ever worked for a government?

13 A No, I haven't. I did an internship with the Department of Commerce.

14 Q Okay. And when was that?

15 A About 10 years ago.

16 Q How about any relatives, close, immediate relatives that work for Federal,
17 State, or local government?

18 A No, I don't have any.

19 Q And then the last question on that thread, have you ever received any grant
20 money or a contract from a Federal, State, or local government?

21 A No.

22 Q Okay. So an example of that might be like a PPP loan. Did you ever
23 receive any PPP loans?

24 A No, I never received a PPP loan.

25 Q All right. Then I think I'd like to jump straight into your involvement with

1 the Proud Boys and ask how you first got involved with the group.

2 A Yes. Well, I was -- I got involved -- I had a -- a friend, somebody I -- he's a
3 friend from another organization I'm a part of. And he -- he just suggested I go hang
4 out, and then I ended up joining.

5 Q Okay. And around when was this?

6 A It was -- it was about 2 years ago, I think, like -- yeah, a little more than 2
7 years ago.

8 Q Okay. So was that early 2020 or late 2019, do you recall?

9 A It must've been like -- I believe it -- like November 2019.

10 Q Okay. So pre-pandemic?

11 A Yeah -- right -- right before it. Right before the pandemic.

12 Q And then you mentioned that it was a friend that kind of introduced you to
13 the group, and that you were both associated with another organization. Can you tell
14 me who that friend was and what that other organization was?

15 A Yes. Pedro. It's Masonic Lodge in Coral Gables.

16 Q Okay. Is that Pedro Barrios?

17 A Yes, Pedro Barrios.

18 Q Okay. And then, so, when you were introduced to the group, how did
19 Pedro describe what the group was?

20 A It was -- it was described as -- it's like a fraternal organization, we hang out,
21 involved in, you know, we go to rallies and stuff like that.

22 Q Okay. And what attracted you to the group?

23 A It was -- it was just, you know, hanging out a couple times. It was just kind
24 of fun, just hanging out and we were doing things, like -- like rallies and stuff like that.
25 It's something interesting.

1 Q Okay. Sure. What sort of rallies was it that you were attending, or do you
2 remember any specific ones in that early time period?

3 A Oh, man, early in the time period, most stuff was, like, Trump-related,
4 just -- you know.

5 Q Okay.

6 A Yeah.

7 Q How about as you moved kind of into 2020 and the pandemic started, did
8 you participate in any COVID-related rallies, lockdown-related rallies?

9 A There was some going on. I didn't participate in too much of that. I did
10 some things, like Unmask the Children, stuff like that. There were a lot of moms, they
11 asked me to support them, you know, they wanted someone to be there with them. So
12 I helped out the moms in the community, gave them some support for that.

13 Q Okay. So you said that the rallies that you were attending with the Proud
14 Boys were mostly Trump rallies. Is that right?

15 A Yeah, for the most part.

16 Q Okay. Can you just describe kind of when you joined the organization, was
17 there a particular political ideology that you associated with the Proud Boys?

18 A At that time, I was just a Republican.

19 Q Okay.

20 A Republican Party.

21 Q Were all the Proud Boys that you knew supporters of President Trump?

22 A The majority, I would say. There was people with different beliefs. Some
23 people were Democrats that became Republicans, but more or less, a lot of people liked
24 President Trump.

25 Q Okay. Would you say that support for President Trump was sort of a -- like

1 an organizing principle for your group of Proud Boys?

2 A Vaguely. It was -- it was -- it wasn't like a principal thing, but, you know, a
3 lot of people, yeah, they like Trump.

4 Q Okay. What would you say was the principal thing?

5 A I would say just camaraderie. It was, you know, a group of guys, fraternal
6 organization.

7 Q Okay. Other than Trump rallies, what sorts of activities did you engage in
8 with that group of Proud Boys?

9 A We've done meet-ups, barbecues, I've done a camping event. We -- yeah,
10 well, we did a -- like, things for Cuba. You know, Miami is a big Cuban community. So
11 anything involving Cuba and -- and, you know, what goes along with that in Miami, so.

12 Yeah, most of that, Cuba, here in Miami specifically, it's a big -- it's one of the
13 unifying factors, is that a lot of guys are of Cuban descent. So when we see atrocities
14 going on in Cuba, we do our best to back that.

15 Q Okay. That makes sense.

16 Was there a name for the group or the chapter that you joined?

17 A Yeah, Vice City.

18 Q And about how large is that -- and that's known as a chapter, right, that was
19 your chapter of Proud Boys?

20 A Yeah. It's -- it's a chapter, Vice City. It varies from the time I've been in,
21 but it's like 10 to 15 people, maybe.

22 Q Okay. And have you ever held any positions or offices or titles within that
23 chapter?

24 A I -- the only thing I -- recently I'm the secretary, but that's it.

25 Q Okay. Who was president of that chapter?

1 A I -- I would want to assert my Fifth Amendment privilege on that.

2 Q Okay. So I'm going to try to rephrase the question maybe, and then we can
3 revisit that issue. Has the leader of that chapter been the same since you joined?

4 A Has he been sanctioned to join?

5 Q Has the leader of the chapter been the same since you joined --

6 A Oh, no.

7 Q -- the same person?

8 A No. It's -- it's changed a few times.

9 Q Okay. Do you know Enrique Tarrío?

10 A Yes.

11 Q Has he ever been the president of your chapter?

12 A He -- at the time I joined, he was the chairman, and then he was kind of, like,
13 default president because of -- because he was the chairman, it was kind of like -- like,
14 there wasn't an option.

15 Q Right. Understood. Can you explain or just describe your relationship
16 with Mr. Tarrío? How did you first meet him?

17 A I first met him -- I don't remember specifically when I first met him, but
18 I -- I -- yeah, I met him just through joining the organization, probably -- and I don't
19 remember specifically where I first met him, but I've -- I'd -- you know, I'd see him come
20 and go and -- and -- yeah.

21 Q Okay. Do you know if Mr. Tarrío is still the chairman of the Proud Boys?

22 A No, he's not.

23 Q Okay. Is there a current chairman?

24 A No.

25 Q And are there -- do you know of other chapters in Florida?

1 A Yeah. There's a -- there's a handful of other chapters, but I don't really get
2 involved with them. I focus in Miami. I live in Miami.

3 Q Okay. We'll kind of come back to that and I'll ask you some more questions
4 obviously about the Proud Boys, but I just want to ask quickly about another group that
5 you may or may not be aware of, but are you familiar with the group Latinos for Trump?

6 A I know of them. I don't know about them.

7 Q Okay. And is that an organization led by Bianca Gracia?

8 A I'm not sure if she leads it. I know she's a part of it.

9 Q Okay.

10 A I've met her before, but I don't know -- I don't know really anything about
11 her, that she's from Texas --

12 Q Okay.

13 A -- and that's about it.

14 Q Are you familiar at all with Mr. Tarrio's involvement with the organization
15 Latinos for Trump?

16 A He was, like -- like, a State representative or something like that.

17 Q And then you said that you met Ms. Gracia before, I think. Do you recall
18 where you met her?

19 A I met her at a rally -- I met her at a rally before. You know, I've said hi to
20 her, but I don't really know -- I've seen her at speaking engagements as well, but, you
21 know, just in passing.

22 Q And then who -- who's currently the president of your chapter?

23 A I would want to assert my Fifth Amendment privilege on that.

24 Q Okay. Let's see. I have just a couple questions about the structure of the
25 Proud Boys organization.

1 A Uh-huh.

2 Q I know you noted that Mr. Tarrio, at some point, was the chairman of the
3 organization. Is there, like, a national --

4 A Yeah. He was -- well, he was like a spokesman. He was -- yeah, Enrique,
5 at the time, was like a spokesman. He wasn't really -- I don't know if there's a
6 distinction between that.

7 Q Okay. So are those two separate positions? At one point he was
8 chairman and then he was not?

9 A No, I think it's -- you know, I think he tries to say one thing, but technically
10 he's like a spokesman. It's not really -- yeah, he -- I don't know, he tries to make himself
11 sound better than -- than he is sometimes.

12 Q Okay. Do you know, are there national leaders of the Proud Boys?

13 A No.

14 Q Okay. Are you familiar with the elders chapter?

15 A What's the question?

16 Q The elders chapter.

17 A I've heard of the elders, but I don't know anything about them.

18 Q Okay.

19 A I've heard it's not real, too. So I've heard everything, you know.

20 Q Okay. Was there any -- is the way your chapter is run, are you receiving
21 any direction from, or directives from anybody at the national level, or it's just a local
22 group on its own?

23 A It's a group on its own. We don't receive anything from anyone else.

24 Q Okay. And then within the Proud Boys, either officially or just kind of how
25 you discuss different groups, are there different regions of Proud Boys, so, for example,

1 like the South or the West?

2 A No.

3 Q Okay.

4 A It is independent chapters from -- from cities.

5 Q Okay. Does your chapter have either particular relationships with any
6 other chapters, like, particularly close to another chapter?

7 A Not -- not really. We -- we've tried to be friends with the ones in Broward,
8 and it didn't really work out.

9 Q How do you mean it didn't work out?

10 A They -- it just, people don't get along with each other. It's -- yeah, just kind
11 of sad, but people, yeah, I don't know, they just -- people have disagreements and they
12 don't -- they don't want to, you know, communicate with each other, so, you know --

13 Q Can you just describe what the disagreement is a little bit? Is it just a
14 purely social disagreement, or is there some sort of political or ideological difference?

15 A No. It's just, like, personal level. They -- they -- like, it's a -- they think
16 someone's like a -- like -- it sounds stupid, like, someone's too mean or too harsh or too
17 abrasive, they don't want to be around that person or, you know, stuff like that, like
18 a -- personal issues.

19 Q Can you help me understand what unifies all of the Proud Boys, or why be
20 part of the larger group if your local chapter doesn't interact with other chapters?

21 A I guess it's just the -- maybe the name. It's -- people, generally, it's
22 like -- it's an organization. It's like a fraternal organization, so, I guess, it -- maybe just
23 the -- the -- you know, if you were going to join an organization, it just -- it's a good one,
24 something like that, like, they have some type of recognition. It's not like, Oh, I'm a part
25 of the whatever, you know, some -- something no one's ever heard of.

1 Q Okay. So then am I hearing that it was sort of the notoriety of the Proud
2 Boys that drew you to them initially?

3 A When I first joined, I didn't -- I didn't know much about them. I'd heard of
4 them. I've heard of Gavin McInnes. But I -- but I had heard of them, so I don't know, it
5 was interesting. It was -- it was -- but, yeah, the notoriety, it's like you kind of know
6 what it is, but there's a level of curiosity.

7 Q Okay. As you're considering people who might join your chapter, what do
8 you look for in a person?

9 A I don't -- I don't recruit people or do vetting, so I don't -- but, you know,
10 usually somebody that's -- seems like a -- a decent person.

11 Q And can you just describe a little bit more about what you mean by a decent
12 person?

13 A Someone that doesn't -- I know Enrique was in there, but, you know,
14 somebody that -- that's not really -- we don't want somebody that's like a -- that has
15 some, like, crazy criminal record or somebody that, you know, is, like, some crazy drug
16 use, like, on a bunch of drugs and stuff like that. So it's, you know, it's just people that
17 are somewhat, you know, they're decent people.

18 Q Okay. Is -- am I right that there are different levels of membership in the
19 Proud Boys?

20 A There -- yeah, there is.

21 Q Okay. And what level membership are you?

22 A I was second degree.

23 Q And did you say you "were" a second degree?

24 A I'm -- yeah, I'm a -- I -- I'm a part -- yeah, I'm a second degree, like, it's
25 a -- yeah, I am.

1 Q Sorry. I didn't mean to ask a confusing question. I just mean, are you still
2 associated with the Proud Boys?

3 A I assert my Fifth Amendment privilege on that.

4 Q Okay. Can you tell me what the -- what the different levels of membership
5 mean or what you have to do to be at each level?

6 A Yeah. The different levels are -- it's -- it's kind of like built on a joke, so it
7 sounds funny, but the first one is, you're like a prospect. You -- you just kind of get
8 sworn into the group. Second level, you get -- you have to -- usually you have to be in
9 there for a certain period of time. Then you get -- you get punched while naming five
10 cereals.

11 And then the third one, you usually get a tattoo or -- and you -- and it's like a -- it's
12 like you experience a hardship or something like that.

13 Q Okay. And then is there a fourth level also?

14 A I don't -- not -- not that I know of, but people say there is. I don't know.

15 Q Okay. And then after you reach second level, did you -- or have you ever
16 done anything to distance yourself from the Proud Boys or disassociate?

17 A I'm not as involved as I was. There's good people in there, so, like some of
18 them, I would say are -- are friends. But I -- it just -- yeah, I don't really like to do too
19 many things out in the public anymore. I just work all the time.

20 Q Okay. And when would you say that you became less active in the Proud
21 Boys?

22 A Probably after -- after the election, just kind of things, it -- it didn't, you
23 know, things changed. It just -- not what a lot of people expected, and then, yeah, it just
24 got, you know, it got -- it's just too -- too much.

25 Q And when you say after the election, do you mean, after November or after

1 January once President Biden had taken office?

2 A Well, even after -- I would say after -- I guess after -- I would say, like, the
3 end of December when -- when -- when -- yeah, towards the end of December, it was
4 kind of getting just, it was getting annoying. The whole -- everything in general.

5 Q Okay. We'll get into some more detail on that, but was there something in
6 particular that happened at the end of December in your mind that caused you to start to
7 distance yourself?

8 A It was just -- just a lot of -- I just got too -- too -- it just -- it was like -- it just
9 kind of, I don't know, people's sentiments, like, it just -- it's supposed to be something
10 positive for the community and -- and, you know, being a part of the community,
11 helping -- or being there to support people and bring people up, and you know, to give
12 protection to, like -- like the moms, for example. I'd go out there and help -- help out
13 them. But I noticed just kind of the tone changed a little bit where people were a little
14 disgruntled. And that's not what we're supposed to be about.

15 Q Okay. We'll get a little bit more into that later --

16 A But it was like a -- as -- as, like, a general population, as far as that goes.

17 Q I'm sorry. I didn't hear the first part of that. What --

18 A Yeah. People, in general, were, like, disgruntled, like -- just a lot of people
19 were mad throughout the -- like, general population-wise.

20 Q Okay. So you're saying Proud Boys, like the general population, were
21 becoming disgruntled?

22 A Yeah. Just like the environment, the whole environment of -- of, I guess,
23 politically, people were just kind of, you know, a lot of added pressure on the -- the
24 country, pandemic, a lot of things going on. So I think just people in general
25 were -- were kind of upset.

1 Q Okay. We'll try to understand that more in a bit. I just want to ask a
2 couple more things about, sort of the operations of your chapter in Florida. Did you pay
3 dues or fees to be a member?

4 A To join initially, I didn't pay anything.

5 Q Okay. And then how about after that?

6 A We've -- I've put in money for -- so we can, you know, throw events and stuff
7 like that.

8 Q Okay. So that was more, like, fundraising for a specific event as opposed
9 to, like, a monthly or a yearly due amount?

10 A I want to assert my Fifth Amendment privilege on that.

11 Q Okay. Can you tell me if you've ever paid dues for the Proud Boys?

12 A I assert my Fifth Amendment privilege.

13 Q Okay. You mentioned that you've done some fundraising for specific
14 events. Do you recall any of those specific events?

15 A We've raised money for legal defenses. That's not a lot of money, but, you
16 know, we do what we can.

17 Q And whose legal defense did you raise money for?

18 A Various people. I -- I don't want to give specifics, just, you know, people
19 that need help.

20 Q Okay. You know, I'm sure Mr. Webb has described to you that, this is a
21 deposition, so you're obligated to answer all the questions that I ask unless you've got a
22 specific privilege that you're going to assert. So I'll just ask again. Who are the
23 individuals that you've raised money for a legal defense?

24 A I assert my Fifth Amendment privilege.

25 Q Can you tell me, is anybody helping you pay for your legal defense?

1 A No. It's out of pocket.

2 Q For the other legal defense funds that you mentioned, those are other Proud
3 Boys?

4 A I assert my Fifth Amendment privilege.

5 Q Have you raised money for the -- for legal defense for Mr. Tarrio?

6 A Never.

7 Q How about for other members of your chapter?

8 A I assert my Fifth Amendment privilege.

9 Q Do you still -- just continuing on the issue of just kind of raising money or
10 how your chapter deals with raising money, do you sell merchandise to raise funds?

11 A Some -- it's not a lot of money, but some people try to sell, you know, little
12 things, coins and stuff like that.

13 Q Okay. And have you ever participated in that?

14 A No.

15 Q When you've done fund raising for other legal defense funds or particular
16 events, how did you raise the money? Was it cash or some other method?

17 A I assert my Fifth Amendment privilege.

18 Q Did you raise any money related to the 2020 election?

19 A No.

20 Q How about for events in November, December, and January, and I'm going
21 to specify, the December 12th -- or sorry -- November 14th rally in D.C., the December
22 12th rally in D.C., or the January 5th and 6th events?

23 A No. People paid out of pocket for their own expenses.

24 Q Okay. How about the use -- well, actually, sorry.

25 Are there any individuals that donate money or give money to your chapter

1 for -- other than specific members of the chapter, anybody that finances any of your
2 operations or activities?

3 A No.

4 Q How about, do you know -- or do you happen to know for other chapters or
5 national organizations of the Proud Boys, do you know anybody that helps finance those
6 activities?

7 A Not that I know of.

8 Q Okay. And then I wanted to ask quickly, do you ever use cryptocurrency in
9 connection with Proud Boys activities?

10 A No. Never.

11 Q And I always ask -- I guess I phrased that question as "do you." Do you
12 know if anybody else in the chapter does?

13 A No.

14 Q So now we're getting to kind of some specific events in 2020, leading up to
15 January 6th. The first one I wanted to ask about is, do you recall the Presidential
16 debates in 2020?

17 A Yes, I do.

18 Q Okay. And do you recall the specific event in September where the Proud
19 Boys were mentioned? Trump used the phrase, "stand back and stand by."

20 A Yes, I remember that.

21 Q Okay. Can you just describe to me how -- your experience of that when
22 you watched the debate and what that meant for you?

23 A Well, let me just preface it that I joined right before he said that, maybe a
24 week or two. And it did -- it did gain a lot of attention when he made that statement.
25 When he said, "stand back, stand by," I didn't think much of it. I thought it was -- it was

1 funny that the President recognized the group, but he -- I don't think he -- he meant
2 anything bad about it. He -- I think he's just saying -- I didn't take -- take any meaning
3 out of it, just that he -- that -- the media tries to portray it as one way, and he was just
4 saying, Yeah, like, just don't worry about it, stay calm.

5 Q Okay. I guess I can be a little more specific. Let's take it from the
6 approach of recruitment or membership of your chapter. Did you gain additional
7 members or additional interest in your group after "stand back, stand by" happened?

8 A No. I got in right before, and once he said that, they stopped bringing
9 people in because it was -- there was an increase in interest, but at least I can speak, the
10 Miami chapter stopped, they didn't let anyone in.

11 Q Okay. And I just want to clarify a little the timeline of your joining the
12 Proud Boys. So I know you said it was late 2019, and maybe very early 2020 that you
13 started hanging out with some of the members of your chapter. But then you've just
14 said that you joined shortly before that September --

15 A Yeah. I don't remember the date specifically, but I joined well before those
16 comments, like a week before.

17 Q Okay. So I just want to draw the distinction. So in the time period from
18 late 2019 to, you know, August, September 2020, were you not officially a member?

19 A No. I -- sorry. I got the -- the years messed up in my head. I wasn't -- it
20 wasn't 2019. It was previous to those comments. I -- I'm miscalculating in my head.

21 Q That's okay. I was just trying to use the pandemic as a marker for you. So
22 then it was during -- it was after pandemic, after March 2020 that you first were
23 introduced to the Proud Boys?

24 A Yeah, yeah. I'm trying to think, March 2020, is -- yeah. Yeah, yeah, it was
25 afterwards. Yeah, sorry, I got a year off in my head.

1 Q No, that's okay. I know it's hard to remember exactly when
2 something -- especially now that it's a couple years later.

3 A Yeah.

4 Q So when you -- you had just joined, President Trump said, "stand back, stand
5 by," did you guys use that to either raise money or recruit new members?

6 A No.

7 Q Okay.

8 A We stopped recruiting once he made those comments.

9 Q Okay. And why did you stop recruiting?

10 A There was an increase in interest, and -- and there was a decision made just
11 to not -- to stop recruiting, that it was -- it was too much.

12 Q Okay. And I can represent to you that Mr. Tarrio at least has said that
13 membership doubled after -- membership in the Proud Boys doubled after the "stand
14 back and stand by" comment. What do you make of that? Do you think that's not
15 true?

16 A He -- he tries to embellish a lot of things, for sure. There was an increase of
17 interest, but as far as Miami goes, I know we stopped recruiting people.

18 Q For activities, either in Florida or anywhere else, were you or to your
19 knowledge any members of your chapter in contact with anybody in the Trump campaign,
20 or the Trump White House, as far as being involved with campaign activities?

21 A Not that I know of.

22 Q How about any other politicians that you were supporting at that time?

23 A Yeah. There's -- there's no current -- no politicians that -- that are -- there's
24 some local politicians that -- there are candidates that will try to get -- get momentum for
25 their campaign by -- by being close to us, but they don't go anywhere.

1 Q Okay. And that -- that you mean as, like, local?

2 A Yeah. Like, these, like, people that aren't -- nobody knows who they are.

3 Q Okay.

4 A They try to get signatures and stuff like that to get on the ballot. But as far
5 as a big campaign, no.

6 Q Okay. How did you normally communicate with other Proud Boys in your
7 chapter?

8 A I communicate with them on my phone, or sometimes a group chat.

9 Q Okay. And what applications did you use for your group chatting?

10 A Just a -- a Telegram chat.

11 Q Telegram? Okay. I'm going to -- I just have a list of some common
12 applications or platforms that people use to communicate, and I just kind of want to run
13 through it with you real quick. You can tell me if you used the application or the
14 platform with Proud Boys or not.

15 A Okay.

16 Q If that makes sense.

17 A Yeah, that makes sense.

18 Q So you mentioned Telegram. How about Signal?

19 A No, I've never used that. People -- all these new things come out, so
20 people, of course, they check it out. They see -- they want to get familiar with it, but we
21 don't -- we don't use that. We don't use Signal.

22 Q Okay. When you say that, you kind of stated that generally. Did you
23 download Signal to use it or check it out? Is that what you mean?

24 A Yeah, I've checked it out, but I never used it, like, I don't
25 use -- its -- its -- yeah, there's -- especially now, there's a bunch of new apps coming out,

1 social media, and people trying to kind of get away from Facebook and -- and use other
2 platforms. So there's always something new coming out every couple months. So,
3 yeah, you know, I don't even care -- I've tried Signal, though, but people -- we don't use
4 that. It's Telegram.

5 Q Okay. How about, did -- were you on -- I'm sorry. Let me just clarify.
6 Did you use Telegram around the period of the election and then [inaudible] January 6th?

7 A Yeah. There's -- yeah -- it's -- it's Telegram.

8 Q How about Parler, were you on Parler around that time?

9 A No.

10 Q How about Zello, have you ever heard of Zello?

11 A I've heard of it. I don't -- I don't use.

12 Q Okay.

13 A I've tried things out, but like I said, I might've made a Parler account, but I
14 don't use Parler.

15 Q Okay. Understood. Did you exclusively use Telegram, or would you also
16 just text or email with Proud Boys?

17 A Yeah, mostly Telegram, maybe -- they were like -- some of them were
18 like-- well, they're my friends, so I, you know, communicate, phone calls, text messages.

19 Q But more commonly if it was like a group Proud Boy-related conversation,
20 that would happen on Telegram?

21 A Yeah. Generally, yeah, Telegram group chat.

22 Q How about Twitter, did you use Twitter?

23 A I -- I have a Twitter that I don't really use. I look at news sometimes on it.

24 Q What about during the election time period, so up until November, and then
25 November, December, January?

1 A Yeah, I don't use Twitter like that. I just look for information usually.

2 Q Okay. I know earlier when we were talking, you mentioned some of what
3 you would do when you were at rallies was protecting the people that were at them. Is
4 that correct?

5 A That would -- that would happen sometimes.

6 Q Can you just kind of generally describe to me what you mean? What would
7 you do when you were protecting other people?

8 A Well, I -- I haven't -- I didn't really do that too much. Like, I did it once just
9 because I was close by, and, Hey, help us out. But it was, like, my one experience of it
10 was General Flynn was coming to walk to his -- this, like a -- like, a bus for where, you
11 know, where they hang out. And they -- there's thousands of people, so you just kind of
12 make a barrier so he could walk by. And that -- that's it.

13 Q And what event was that at?

14 A I believe that was the -- I think that was in December. Yeah, that was in
15 December, the one in D.C.

16 Q Okay. So that's the December 12th event.

17 And that was just something that happened kind of spur of the moment, or did
18 you communicate --

19 A Yeah. I was standing there, and they're, like, Hey, General Flynn's on his
20 way here. We need people to make a path for him. So that was -- that was a
21 spur-of-the-moment thing.

22 Q Okay. And I know you said that you weren't personally involved in doing
23 that sort of security work previously, but had you talked to or did you know of other
24 Proud Boys that did do that at other rallies?

25 A There's -- I don't recall exactly who was there at the time I did that, but it

1 was -- it was -- I've seen -- I've seen it, but it's -- it's nothing like -- it's like, Oh, follow this
2 person around. It's like really make sure -- it's like Enrique's girlfriend, follow Enrique's
3 girlfriend around. It was like -- so.

4 Q Did any of this protection involve encountering other groups -- and this is
5 just talking generally about what your experience with other Proud Boys has been. But
6 did any of the protection that you're talking about involve countering other groups, like
7 antifa or any associated groups?

8 A Not that I know of. It was mostly -- it was just at rallies, like, make sure -- it
9 was like having an extra person by your side. Who knows, you know, anything could
10 happen.

11 Q Okay. And do you know if anybody was paid for that work, or if it was just
12 volunteer?

13 A Not that I know of. I would say no. People don't like to spend money.

14 Q Before we get into some of the specific events, I also just kind of wanted to
15 understand your mind-set around the election period, and then leading into January, and,
16 in particular, I was curious about how you felt about the validity of the election or the
17 election integrity. Did you have any concerns about election integrity around the 2020
18 election?

19 A I was kind of impartial on it, like I -- I always hope that the election is -- has
20 full integrity and is a free and fair election, but I'm more of a wait-and-see guy, so I was
21 waiting to see what -- what was going to happen with that.

22 Q Did you think that the election had been stolen?

23 A I don't think it was out of the realm of possibilities, but I didn't take a stance
24 on it.

25 Q Okay. Can you help me understand what sort of -- what sort of a purpose

1 or message did you associate with the rallies in November and December and January
2 that we've talked a little bit about, but we'll get into some more detail?

3 A They were -- yeah, a lot of them, they were -- it was like a -- like Stop the
4 Steal and stuff like that, for sure. There were people that were -- were very -- and, like,
5 you know, that was a big issue for them, for sure.

6 Q But were you -- for you personally, you either weren't convinced or were
7 undecided about whether or not the election had been stolen?

8 A Yeah, I was -- I like to wait and see for more evidence to come out, more
9 factual information.

10 Q Okay. Let's talk about Election Day specifically. What did you do? Do
11 you remember November 3rd? What did you do on Election Day?

12 A I -- I don't recall. I probably went to go vote. I don't recall specifically.

13 Q Did you participate in any activities with Proud Boys around the election or
14 Election Day?

15 A I -- by my -- it wasn't a Proud Boy-specific thing, but I was -- I -- I -- I was a,
16 like, a -- I don't even know. There's like a -- like -- so I live right next to a polling location,
17 so I was out there supporting people, but it wasn't Proud Boys. It was like a group
18 of -- of regular people.

19 Q Okay. Did you participate in any poll-watching or patrolling any polling
20 locations?

21 A No, I didn't -- I didn't do any poll-watching.

22 Q Okay. And then you just said around the Election Day, it wasn't a specific
23 Proud Boys event, but that you were supporting --

24 A Yeah. I was, like, holding, like, an American flag outside a polling location.

25 Q Okay.

1 A But it was, you know, like within a -- you know, outside on the street. So
2 people drive through, they see, you know, people holding flags and stuff.

3 Q Okay. And who were the other folks that you were doing it with?

4 A I don't recall spec- -- it was just like a -- like, I don't recall specifically.
5 Some, like, older people, yeah, who was there, it was -- it was like a handful of people.
6 Just -- I don't recall specifically who was there.

7 Q Okay. That's fine. Were there other -- were there other Proud Boys
8 there?

9 A Yeah -- yeah. I don't remember specifically who was there, but it
10 was -- yeah, it was like a -- like, maybe seven people just holding flags.

11 Q And do you -- can you guesstimate how many of the seven were Proud Boys?

12 A Probably like three of us.

13 Q Okay.

14 A Yeah.

15 Q And just describe in a little more detail for me what it was you were doing.
16 So you were near a polling place, holding an American flag?

17 A Yeah.

18 Q Were you making any statements?

19 A It was -- yeah, it was just, you know, people -- I don't -- I don't recall exactly
20 what, but, yeah, people would say, like -- cars would drive by, we wave at the cars, and
21 you know, just stuff like that. But I don't even remember if that was the -- that was -- I
22 don't remember exactly when that was, but I remember doing that. That was -- I don't
23 even think that was for the primary election. That might've been a previous one.
24 Yeah, yeah -- I vaguely remember it. It's like --

25 Q Okay. We can move on from Election Day. Let's talk about the November

- 1 14th rally in Washington, D.C. I believe you already mentioned you attended -- you
- 2 attended that rally, correct?

1

2 [11:02 a.m.]

3 The Witness. Wait. Which rally was it?

4

BY [REDACTED]

5 Q The November 14th rally in D.C.?

6 A Yeah, I was there.

7 Q Okay. And am I right that you traveled on a private plane to D.C. with a
8 group?

9 A Yes. I was on a charter plane.

10 Q Okay. And who was the group that you traveled with?

11 A It was a couple Proud Boys.

12 Q Anybody else?

13 A No.

14 Q Okay. If we can pull up exhibit 3 to look at -- this is a photograph that I
15 believe -- and you can tell me -- was taken on November 13th.

16 Was it on the 13th that you traveled on the plane? We can zoom in to this in 1
17 second.

18 A Yeah, I was there.

19 Q Okay. Great. Let's -- if we can zoom in to the photo a little bit so we can
20 scroll through different parts of the photo.

21 A Yeah.

22 Q Okay. And then scroll down so that we can see the faces of the people.
23 Okay.

24 Can you just tell me who this group is? I'll note, for the record, it's a large group,
25 about 15 or 20 people on the tarmac and they're holding a sign that says Latinos for

1 Trump 2020?

2 A Yeah. Well, half of those people are from, I believe, they're from Texas.
3 They weren't on the plane with us; they were just there at the airport. They dropped us
4 off. We were -- and the other half are Proud Boys.

5 Q Okay. Are -- did the other individuals -- so the folks from Texas, did they
6 travel on a different plane or why did they go to the airport with you?

7 A I believe they were -- yeah, they must have been on another plane and went
8 back to Texas, but yeah.

9 Q And had you -- I know you mentioned that you had met Bianca Gracia
10 before. Was it before or after this November 13th flight? Do you remember?

11 A I met her in passing before this.

12 Q Okay.

13 A Yeah. It might have been -- I might've met her, like, a day before this as
14 well. It wasn't like -- I didn't know her for a long time. I met her previously.

15 Q Okay. And then if we can take a photo and you can -- sorry. Take a
16 second to look at the photo and you can direct -- we've got a professional staff member
17 that's controlling the image. If you could just take a second and look at the photo and
18 then look at the names associated with the people and tell me if any of them are
19 incorrect?

20 A Yeah. I don't know a lot of those people, but the people I know their
21 names are accurate.

22 Q Okay. And are those -- those are the men that are Proud Boys in the photo
23 that you can say are accurate?

24 A Yeah. Exactly.

25 Q Okay. Let's pull up exhibit 4.

1 A Uh-huh.

2 Q Is this photo from the same day?

3 A No.

4 Q It's not the same day?

5 A No. It was departing from Miami.

6 Q Okay. So just to clarify, the photo we just looked at, was that in D.C.?

7 A That's correct.

8 Q Okay. So the first photo you had flown to D.C. and they met you at the
9 airport and then this photo is the departure from Miami?

10 A Yeah. It was leaving and then the other one was coming back, yeah.

11 Q Oh, okay. I understand. So what day was the first photo taken on?

12 A I don't remember the date specifically.

13 Q Okay. Did you -- when you left the November 14th rally, was it on the day
14 of the rally or was it the next day?

15 A Oh, man. I don't remember specifically. I remember getting there and
16 we were immediately -- we went to -- we went to the rally. It must have been -- yeah.
17 We arrived and we went straight -- wait. I don't remember 100 percent of -- well, yeah.
18 We went there -- it was the day of, yeah.

19 Q Well, we'll work on the timeline for a second, but just to be clear, this photo
20 that we're looking at now with just -- exhibit 4 with just other Proud Boys that was taken
21 when you were departing from Miami on November 14th. Is that right?

22 A I don't know the dates specifically, but we -- yeah, we departed from Miami.

23 Q Okay. Let's zoom in to the photo a little bit. And then a little bit more if
24 we can.

25 Okay. These are all members of your chapter?

1 A At that time, yes.

2 Q Do you know who -- you had mentioned that this was a chartered plane. Is
3 that right?

4 A Yeah. Yeah.

5 Q Do you know how the chartered plane was arranged or who arranged it?

6 A I have no idea.

7 Q Okay. Did anybody mention anything about -- do you know if Enrique
8 Tarrio arranged the plane?

9 A Not that I know of.

10 Q Did you ask any questions about how -- how you were getting on this private
11 plane to fly to D.C.?

12 A I did ask that question.

13 Q Okay. What was -- what was the response?

14 A That nobody knows.

15 Q Okay. And that who -- who told you -- who confirmed that they didn't
16 know or they knew?

17 A I believe I asked Enrique and, I said, how did this happen? How did we get
18 this plane? And we -- that doesn't -- they say we don't ask those questions, something
19 like that. So nobody would say anything.

20 Q Did that seem odd to you?

21 A A little bit. It seemed a little odd. At the same time, it's better than flying
22 a commercial flight.

23 Q That's true. I wish that I could fly a chartered plane.

24 A The food was good, too.

25 Q Other than having a specific conversation with Enrique, do you remember a

1 specific conversation with anybody else in this group about who had arranged the flight?

2 A Nobody -- nobody knew. Nobody knew -- yeah, nobody knew, but --

3 Q How did you know to take this flight? Who told you to come to the tarmac
4 at that time?

5 A Oh, man. I don't -- I don't recall specifically. I did buy a plane ticket to go
6 and then last minute they're like, hey, you want to go on a plane? So I canceled the
7 plane ticket and I ended up there.

8 Q When you say "they," who was the first person to tell you about the plane?

9 A I don't recall specifically who asked me to go. I don't recall, but I -- yeah, I
10 don't know who invited me specifically.

11 Q How did getting to the plane work? Like, did you travel as a group to the
12 plane? Did you have to check-in with anybody at the airport?

13 A We met -- we met there at the -- the -- like, it's like a check-in counter. You
14 go on -- so I took the metro to -- to the -- it goes by the airport and then just took an Uber
15 to the airport. So people just got there on their own, however, they were going to get
16 there, either they were dropped off by somebody they knew or Uber or some people
17 parked there.

18 Q Okay. I know we talked earlier about the group photo with Latinos for
19 Trump. Did they fly into D.C. also on a private or chartered plane?

20 A I have no idea how they got there.

21 Q Okay. And you don't know how they left, correct?

22 A I don't know, yeah. We took that picture and everyone said bye to each
23 other and went our separate ways. I don't know what they did.

24 Q Okay. And then let's look at -- do you recall -- actually, you can pull down
25 this exhibit.

1 Do you recall -- was the plane associated with President Trump or was there any
2 connection to the Trump campaign?

3 A I want to say no, but I really have no idea.

4 Q Okay. [REDACTED] did you have a question? No?

5 Okay. Let's pull up exhibit 5, and if you can scroll down -- or you can actually
6 zoom out so we can see the whole image. Okay.

7 And then can you -- so is this the plane that you took that has the Trump name on
8 the tail?

9 A I don't recall that being there.

10 Q Okay.

11 A Is that -- I don't know. Can you zoom into that? Did he put that in
12 himself? I don't know. I don't recall that being there. I think that would be
13 something that I would notice.

14 Q Did -- this is your friend Pedro that introduced you to the Proud Boys?

15 A Yes.

16 Q Do you know him to edit photos like that? Have you ever seen him edit
17 photos?

18 A I have no idea. This is my first time seeing that, so I don't believe that was
19 there. I don't know if he edits photos, but I've never seen that before.

20 Q Okay. Do you remember any conversations when you took the plane about
21 whether or not, you know, any association with the Trump campaign or President Trump?

22 A No. I was new to the organization, so I was just, like, small talking with
23 people. We didn't -- nothing was talked about the plane.

24 Q Okay. What did you talk about on the flight to D.C.?

25 A I was sitting in the back with that guy George that was in the previous photo,

1 and we were just talking about -- like, the guy was in the Army and he -- how
2 he -- he -- his, like, religious views and how he -- just, like, stuff about his life, what he
3 does, a lot of stuff like that.

4 Q Is that George Meza?

5 A Yeah.

6 Q Okay. Does he also go by rabbi Meza?

7 A Not that I know of. I've never heard anyone call him that.

8 Q Okay.

9 A But -- I don't really -- I don't associate with him at all, but I did meet him for
10 the first time on the plane.

11 Q Was he a member of the vice city chapter?

12 A He's from Broward, but he -- at that time it included Broward, so I guess he
13 is, but not currently -- currently, no. I don't even know where he is actually right now,
14 but at the time it was the same group.

15 Q Okay. And did the -- so I take it then that the vice city group and what is
16 now the Broward chapter split off at some point?

17 A Yeah. That's correct.

18 Q And when did that happen?

19 A I don't recall specifically.

20 Q Okay. Do you know -- you don't know if he's still a member of the Broward
21 chapter?

22 A I have -- I have -- I don't know anything about him. He -- I don't talk to him
23 at all. I don't think -- I don't want to associate with him.

24 Q Was there a reason for the two chapters dividing or the one chapter
25 becoming two?

1 A People just wanted -- they felt like the distance was an issue and, you know,
2 people complained about various things. So people just wanted their own thing for
3 Broward so it split.

4 Q Okay. And do you know who -- do you know who the president of the
5 chapter is?

6 A I assert my Fifth Amendment privilege.

7 Q Okay. I want to try to understand the scope and the concourse of the Fifth
8 Amendment assertion that you're making, and I also just kind of want to make sure that
9 you understand what it means to assert the Fifth Amendment.

10 A Okay.

11 Q Do you understand that the Fifth Amendment protects your rights to refuse
12 to answer questions if the truthful answers would be incriminating? So in other words,
13 by telling a truthful answer to that question, you would be making -- you would be a
14 witness against yourself for previous conduct which you reasonably fully view could be
15 prosecuted?

16 A I wasn't aware of it.

17 Q So your response to the question about -- and I know previously you haven't
18 wanted to answer who the president of your organization is and didn't want to now
19 answer the question of who the president of the Broward organization is, I just want to
20 understand the scope why -- can you help me understand why answering that question
21 would be a Fifth Amendment issue for you?

22 Mr. Webb. [REDACTED], I'm going to have to -- you're asking him to say why he
23 wants to assert the Fifth Amendment privilege?

24 [REDACTED] I'm trying to understand the scope of what the -- I'm actually just a
25 little bit confused about and I'm trying to be sensitive to the areas that he doesn't want to

1 answer questions about. And so he's answered a lot of questions about the
2 organization itself, the members of the organization, but then it's -- in particular who the
3 current president of the Broward group, the vice city group is. Is that the only -- that's
4 the only thing that Mr. Barcenas doesn't want to answer today or at least so far?

5 Mr. Webb. Yeah. That's a correct summary of where he's asserted the
6 privilege, yes.

7 [REDACTED] Okay.

8 Mr. Webb. No, he understands the privilege and what it pertains to. He's
9 asserted it -- I don't think -- he doesn't have to answer why he wants to assert it --

10 [REDACTED] What I actually meant was, I just wanted to make sure I understood
11 what were the topics on which --

12 Mr. Webb. Oh, okay. Okay. Yeah. No. It's correct. He asserted it there.

13 [REDACTED] Okay.

14

BY [REDACTED]

15 Q Okay. So for the November 14 rally, did -- did you or any others that you
16 traveled with provide any security services at that rally?

17 A I -- I don't recall. I didn't -- I didn't do any myself, but I don't know what
18 other people did.

19 Q Did -- were you in contact with any other groups, like, folks that were
20 organizing the November 14th rally or other groups that were attending the rally, or was
21 it just the vice city Proud Boys that you traveled with?

22 A It was just the Proud Boys, vice city.

23 Q Okay. Do you know -- I'm just going to name a couple individuals involved
24 with the November 14th rally and -- individuals and groups, and let me know if this
25 triggers your memory about their involvement.

1 Do you know the organization Women for America First?

2 A Women for America First? I don't -- no, I don't know them.

3 Q It's run by a mother and daughter, Amy and Allie Kylie Kremer?

4 A I don't know them.

5 Q Okay. How about Ali Alexander?

6 A I don't know who that is.

7 Q Roger Stone?

8 A I know -- I know who Roger Stone is.

9 Q Okay. Have you ever met Roger Stone?

10 A I met him once in -- at an event. He just showed up real quick, took a
11 picture, and left.

12 Q Okay. What event was that?

13 A It was, like -- it was, like, a street corner rally. He said he was driving by
14 and he showed up.

15 Q And did -- you said a street corner rally?

16 A Yeah, in Broward.

17 Q In Broward. Okay. Do you remember around the time frame?

18 A I don't recall exactly when that was. I don't recall. It would have been,
19 like, 6 months ago maybe, 5, 6 months ago.

20 Q Have you ever heard of or talked to any Proud Boys about providing security
21 for Roger Stone at any events?

22 A No.

23 Q Okay. And then let's just one more time quickly try to talk about when you
24 left the November 14th rally. You flew in, I think we've established, the day before the
25 rally. Is that right?

1 A That was the charter plane?

2 Q Yeah, the charter plane.

3 A I want -- we got there -- we got to the airport in the morning, we flew there,
4 and I want to say it was the day of. We got there and we immediately started doing
5 things. It was, like, a really hectic day.

6 Q Okay. Did you have a hotel when you stayed for the 14th?

7 A Yeah. I stayed -- I was at a hotel.

8 Q What hotel did you stay at?

9 A The Phoenix Hotel.

10 Q And did everybody else in your group stay at the Phoenix?

11 A For the most part, a lot of -- it was -- a lot of people stayed there.

12 Q When you say "for the most part," do you know of anybody in particular that
13 did not stay at the Phoenix?

14 A Not -- not in particular, but I would imagine that, you know, not everyone
15 stayed there.

16 Q Do you remember how many nights you stayed in D.C. for that event?

17 A It was quick. It was -- I don't remember specifically, but it was a short
18 period of time.

19 Q Okay. And then did you take the chartered plane back to Miami?

20 A Yeah.

21 Q And then that's -- so it's the trip back that you took the photo on the tarmac
22 with the Latinos for Trump sign?

23 A Correct.

24 Q Okay. How about other rallies -- so we're going to get to the
25 December 12th rally in a second.

1 Did you attend any other rallies in between November and December?

2 A No.

3 Q So there was a November 18th rally in Georgia, I take it, you did not attend
4 that rally?

5 A No.

6 Q Okay. Then let's talk about December 12th. How did you travel to D.C.
7 for the December 12th rally?

8 A December 12th? Took a commercial plane.

9 Q Okay. And did you travel with a group for that?

10 A No. I was by myself.

11 Q Were you meeting anybody in D.C. for that event?

12 A It was Proud Boys meet-up at the hotel.

13 Q Okay. How -- was it the Phoenix Hotel again?

14 A Yeah, it was at the Phoenix Hotel.

15 Q How -- so no other members from your chapter went for the December 12th
16 event?

17 A I don't remember specifically who was there. It was -- there was people
18 that go, but I don't remember specifics.

19 Q Just take me through your -- you can just take me through your experience
20 at the December 12th rally. So you flew up on a commercial flight, and then what
21 happened after you took your flight up there?

22 A I -- it's -- I don't remember 100 percent of -- yeah, we went to the rally.
23 There was -- it's -- it was a huge rally, thousands of people there. Watched -- there was
24 some speeches. Like, Trump apparently flew over in a helicopter. We ended up
25 going -- there's, like, photo ops and stuff like that. And then -- and then that was the

1 day time. At night, I think somebody got stabbed. Just like, some crazy stuff was
2 happening.

3 Q Did you know any of the guys that got stabbed?

4 A The one guy -- I didn't know him. I met him before, but I didn't know him.
5 I've seen him around, you know, he comes and goes, but no. I just -- I just know he got
6 stabbed.

7 Q And do you know that person's name?

8 A I think his name's Jake.

9 Q Jake. Okay. It's not -- is it Jeremy?

10 A Jeremy. Jeremy. Yeah. That's right.

11 Q Jeremy Bertino?

12 A I don't know his name for sure, but yeah, Jeremy. That's right.

13 Q Were you with Jeremy on that day?

14 A No.

15 Q Do you remember on the 12th or let me know if this triggers any memories
16 for the 14th, do you remember ever creating like a perimeter around any areas with any
17 other Proud Boys?

18 A I didn't do that, no.

19 Q Did you hear about other Proud Boys doing that?

20 A Not that I know of. I was -- I was just walking around the streets
21 and -- and -- and -- yeah. I like to do my own thing. I don't know what other people
22 were doing.

23 Q Okay. Was there anybody in particular that you spent a lot of time with for
24 the 12th event?

25 A No, just people I knew from Miami I would, you know, bounce around with

1 different people.

2 Q Okay. Were you with Mr. Tarrio for the 12th?

3 A No. He -- he -- he was -- he does his own thing. He -- I don't know who he
4 was with, but he kind of -- he does he his own thing. He kind of feels special I guess.

5 Q Okay. For both the November and December rally -- I know you mentioned
6 that you used Telegram to communicate with other Proud Boys. Were you using
7 Telegram to chat with Proud Boys about those events?

8 A Most likely. Everything -- that's how people communicate on Telegram.

9 Q Were there -- were there specific chats for the December 12th event or the
10 November 14th event?

11 A I don't recall. I don't remember -- I don't like using chats and all this stuff.
12 It's too much for nothing.

13 Q Okay. What -- what did you use Telegram for then?

14 A It's a way to communicate, but, like, obviously if -- hey, where is everyone
15 meeting up, stuff like that, then I can get a quicker answer than -- you know, but
16 personally I don't -- I'm not somebody that sits in chats and some people, you know, they
17 just have nothing better to do so they chitchat.

18 Q Okay. So for the November -- so for the December 12th, did you use
19 Telegram to find Proud Boys to meet up with?

20 A Well, we had -- we'd meet in front of this restaurant. I don't remember the
21 name, but yeah. It would say, hey, we're meeting at this restaurant, come here.

22 Q Okay. Was it -- was it an individual that messaged you that on Telegram or
23 was that part of a group chat that you were to?

24 A Oh, man. I don't recall. I really don't recall, but it was -- I'm sure it was
25 posted on -- like, it's like the point where the meeting spot everyone go there and

1 socialize and get some beers and stuff like that.

2 Q And sorry. I just want to make sure I understand what you're saying. You
3 said you're sure it was posted. You mean posted to a live chat?

4 A I'm sure -- I'm sure it was mentioned in a group chat like this is where we're
5 going to meet. It was like where -- there was some particular restaurant. I don't
6 remember the name, but yeah. Everyone meet there. It was, like, the meeting spot
7 for -- there was some big car with a rig attached to it and they would set up out there and
8 other people will come. That was like the meeting spot for everybody, you know --

9 Q Was that near a hotel called the Harrington?

10 A Yeah. It was close to the Harrington.

11 Q Okay. Was there, like -- do you remember around the corner, is there a
12 burger place called Olly's Trolly?

13 A I don't know about Olly's Trolly.

14 Q Okay. Then -- so you said -- did you stay overnight for the December 12th
15 event also?

16 A Did I stay -- no. I -- yeah, I stayed overnight and we left in the morning.

17 [REDACTED] Okay. All right. Let's -- actually, we've been going for about an
18 hour and a half right now. Do you want to -- let's take a 5-minute break. We'll just
19 come back at 11:40.

20 The Witness. 11:50?

21 Mr. Webb. 11:40, right? Thanks.

22 [REDACTED] So we'll go on recess. Thank you.

23 [Recess.]

24 [REDACTED] Then we'll go back on the record at 11:42.

25 BY [REDACTED]

1 Q Okay. I'd like to talk about sort of the period after December 12th leading
2 up to January 6th.

3 When did you first become aware that there was going to be a rally in
4 Washington, D.C. on the 6th?

5 A I -- I had heard about the rally -- I don't know, maybe a month before, 2,
6 3 weeks within that time frame before, maybe 3 weeks before.

7 Q Do you remember where you heard about it?

8 A I don't recall.

9 Q Okay. Do you recall any -- did you follow President Trump on Twitter?

10 A I don't use Twitter really. I might've followed him, but I don't use Twitter
11 like a lot.

12 Q Okay. I just ask because there's -- and we can pull it up on the screen.
13 Let's pull up exhibit 8.

14 There's a tweet from President Trump on December 19th, and I'll give you a
15 second to look at that. Just let me know if you need to zoom in on it.

16 Can you read that?

17 A Yeah, I don't know about that tweet.

18 Q Okay. So right at the end of that tweet, brags, "Big protest in D.C. on
19 January 6th. Be there. Be wild" -- "be there. Will be wild."

20 Does that refresh your recollection at all or do you remember seeing this tweet?

21 A Yeah, I've never seen the tweet. I don't know -- I don't use Twitter. I
22 don't really watch the news. I don't follow any specific news outlet, like -- a lot of it is
23 garbage.

24 Q Okay. We can take down this exhibit.

25 Then maybe we can just generally can you tell me what you understood was going

- 1 to happen on the 6th or what the purpose of the protest was?

1

2 The Witness. It was like a Stop the Steal type of thing. I know a lot of people, it
3 stirred their emotions for sure. I know -- yeah, Trump was obviously by the tweet, you
4 can tell he was pushing it pretty hard. Personally, I don't want to go to that event and I
5 ended up -- Enrique asked me last minute. I believe he called me. And he's, like, hey,
6 you go to this, and I was -- I was reluctant, but I ended up going?

7

BY [REDACTED]

8

9 Q Okay. What day was it or do you remember when it was that Enrique
10 called you?

11

12 A I don't recall specifics, but it was pretty close to like -- pretty close to the
13 day, within a few days.

14

15 Q Okay. Close to the 6th?

16

17 A Yeah.

18

19 Q And I think you're aware that he was arrested on January 4th?

20

21 A Yeah.

22

23 Q Okay. So I take it, it was before he was arrested?

24

25 A Before he was arrested, yes.

26

27 Q Okay. We'll get into some of those details in a second, but I guess I just
28 want to understand generally -- you know, you mentioned that other people were
29 emotional about January 6th or the Stop the Steal movement --

30

31 A Uh-huh.

32

33 Q -- but you've described yourself as being somewhat undecided or not so
34 invested in the Stop the Steal movement. Why did you go through the trouble of going
35 to the November, December, and January rallies if you weren't very invested in it?

36

37 A I -- the -- the -- they're like -- I saw them as big events that it was just kind of

1 like going to a music festival or something like that where it's just -- you know, there's a
2 lot of people, you see people speak, you hear some speeches, like the helicopter flying by,
3 that's really cool. So it's more along those lines.

4 Q Okay. Were there members of your chapter that were more invested in
5 the Stop the Steal movement or more felt had stronger feelings about the election being
6 stolen?

7 A I don't recall anyone being like -- like -- like losing sleep over it or anything,
8 but I can't speak for other people. I don't know how they feel about certain things.

9 Q Maybe a helpful way to describe it -- we've heard other folks associated with
10 the Proud Boys kind of draw a distinction between people who were sort of there for the
11 party and people that were actually interested in the Stop the Steal movement or in
12 providing security or being more involved in some of the more kinetic and physical
13 interaction that was happening at the rallies.

14 Does that make say? So some people called them party boys versus rally boys?
15 Have you ever heard that distinction?

16 A Wait. Can you say that again? Rally boys and what?

17 Q And party boys.

18 A I've heard the term, yeah, rally boys. Party boys, I don't really -- haven't
19 really heard that, but I've heard rally boys.

20 Q I just ask that would it be accurate to say that your interest in the November,
21 December, and January rallies were more just a big event that you thought would be fun
22 to attend?

23 A Yeah, I would say that's accurate.

24 Q Okay. And did you have any people in mind either Mr. Tarrío or other
25 groups that you thought had a different feeling about what the purpose of those events

1 were? Like, they were more interested in the Stop the Steal aspects --

2 A I don't -- I don't know about the other -- other groups that went. I
3 didn't -- I go, you know, we walk around, and it was, yeah like a big event, but I don't
4 know about other groups.

5 Q Okay. And maybe I wasn't clear. I don't mean other groups; I mean
6 people in your group.

7 A People -- I didn't feel anyone was there, like, for a specific reason other than
8 to go to a big event, a big rally in, you know, Washington, D.C., kind of historic in a sense.

9 Q Okay. So for the January 6th event and leading up to it, did you hear about
10 the Proud Boys organizing with or attending with any other groups?

11 A No.

12 Q Okay. I'm going to ask you about a couple different groups and just let me
13 know if you know who they are, and then we'll talk about them a little bit.

14 Have you ever heard of the Oath Keepers?

15 A I've heard of them. I don't know -- I don't know about them.

16 Q Okay. How have you heard about the Oath Keepers?

17 A They're, like, news itself and I know they're -- it's mostly, like, veterans and
18 stuff like that, but I don't really know. I don't know anyone associated with them.

19 Q Okay. How about at the time leading into January 6th and for January 6th,
20 had you ever heard of the Oath Keepers then?

21 A Definitely less than I -- than I know now, but yeah. Maybe I've heard -- I
22 don't know anything about them.

23 Q Okay.

24 A Maybe I knew about them at the time, like, I've heard of them, but I don't
25 really recall. It wasn't like a big thing.

1 Q Okay. Do you know if you've ever met an Oath Keeper?

2 A Not that I know of.

3 Q Did you hear any other Proud Boys talking about Oath Keepers leading into
4 the 6th?

5 A No.

6 Q How about Three Percenters?

7 A I've heard of them, too, but I don't know -- I don't know them either.

8 Q Okay. Same questions: Had you ever met anybody that you knew was a
9 Three Percenter?

10 A No, I don't know any Three Percenters.

11 Q Okay. And did you hear any Proud Boys talking about Three Percenters
12 leading into January 6th?

13 A No, I don't -- nobody talked about any of those people. I don't -- I don't
14 know any of them. I don't know who they are.

15 Q So you said that Mr. Tarrío called you and asked you to attend the event.
16 Do you know why he did that?

17 A As far as I know just wanted -- he just was trying to recruit -- get people to
18 go, you know, kind of the more the merrier I would think.

19 Q What were your conversations with Mr. Tarrío like in talking about the
20 January 6th event? What did you guys talk about?

21 A I didn't speak to him much. I just told him that I didn't want to go, and he
22 pushed me and said, yeah, just go do it. I -- I wasn't like -- I didn't go to his house or
23 anything. I wasn't, like, buddies with him, I would say. I wasn't -- but I would, you
24 know -- he -- he was doing his -- his own -- his own thing. He has a little podcast. I
25 don't -- I don't even watch that. I don't care about whatever he puts out. I don't

1 follow his material, like, I don't really care for that and his own persona and all that,
2 but -- he just called me and asked me to go. And I said, man. I was apprehensive, but I
3 ended up going.

4 Q Okay. He called you just on the telephone like a regular phone call?

5 A Yeah. I believe so, yeah.

6 Q Did you talk with Mr. Tarrio through Telegram at all leading into the 6th?

7 A No. I -- I never talked to him really -- like I don't -- I wasn't in regular
8 communication with him.

9 Q Okay. Had you ever been on any -- had you ever messaged with him on
10 Telegram or had you ever been on any group chats that he was also on on Telegram, as
11 far as you're aware?

12 A Yeah. Been in -- in group chats with him, but that doesn't -- it was -- yeah,
13 been in group chats with him.

14 Q Okay. And what were those group chats?

15 A Just -- as far as I know, they're just like -- he's not -- right now I don't think
16 I'm in any chats with him, as far as I know. I don't think so, but at the time it was -- it
17 was the -- the group chat for the -- for the -- for the Miami chapter.

18 Q Okay. So there's a group chat for the Miami chapter around that time. So
19 I'm talking about late December and early January, were you on any group chats with
20 other members from other chapters?

21 A Not -- no. No. I just keep things in Miami. I don't care about what goes
22 on outside of Miami.

23 Q Okay.

24 A Enrique doesn't communicate a lot to -- he was like doing his own thing, so I
25 don't know. It was very brief, hey, come -- come to January -- come to the event on

1 January and especially at that time, the communication -- he didn't -- he didn't
2 communicate with a lot of people.

3 Q Okay.

4 A As far as I know.

5 Q Sorry. You also said that you didn't want to go. Why did you not want to
6 go?

7 A I was at the two previous rallies and I just was kind of like tired. I was like,
8 man, another rally, I can't keep going to rallies every month. So I was kind of just -- it
9 was kind of out of my system to go -- to go to rallies, but -- but he asked me and I was -- I
10 said, well, whatever. I'll just go this one more time and see how it is.

11 Q Do you know if Enrique asked any other members of your chapter to go?

12 A Not that I know of.

13 Q Do you know if anybody else did end up going?

14 A What? They ended up going because he personally asked them?

15 Q Just at all. Did you know of any other members of your chapter that also
16 went to the rally on the 6th?

17 A There were people that went that were from South Florida.

18 Q Okay. How about from your chapter?

19 A I don't remember specifically, but I'm sure there's one or two people.

20 Q Okay. I wanted to ask about somebody that was in one of the photos or
21 actually both of the photos from earlier the November 14th.

22 A Okay.

23 Q Do you know Gilbert Fonticoba?

24 A Yes, I know Gilbert.

25 Q Okay. Is he part of your chapter?

1 A Yeah, yeah, yeah -- yeah, at the time, yeah.

2 Q Okay. And you say "at the time," is he no longer apart of your chapter?

3 A He's -- he's kind of -- he doesn't really talk to anybody any more. He just
4 really is at his house.

5 Q Okay. Did Mr. Fonticoba go to D.C. for the 6th?

6 A Yeah. He was there.

7 Q Okay. Did you travel with him?

8 A No. I -- I just got my plane ticket and I went. I don't recall being with
9 other people on my flight with myself.

10 Q Did you talk to Mr. Fonticoba about your plans to go for the 6th?

11 A No, not that I recall.

12 Q So as far as you're aware, just independently, both of you went to the 6th
13 and he was there --

14 A Yeah. I can't speak for him, but Enrique called me and I was reluctant. I
15 booked a flight and I went, but it was like -- it was within a week; like, it was very short
16 notice.

17 Q Okay. I want to talk about a couple other things kind of preparing for the
18 6th.

19 Did you do any fundraisers for anything related to the 6th either travel, maybe
20 equipment that you needed or you used for the 6th?

21 A No, not at all.

22 Q Okay. Were you aware of other Proud Boys' fundraisers?

23 A I don't know of any fundraisers that were for that particular event.

24 Q Okay. What did you think the 6th was going to be like? I know it's a
25 broad question, but --

1 A Yeah. Well, I thought it was going to be similar to the previous two events.
2 It just was -- I kind of saw it as like -- like the last time Trump was going to speak to a large
3 audience like that or -- and possibly like it could be it, the last time I get to see Trump
4 speak or something. And I don't know. Yeah. It's a big historic event.

5 Q Did you do anything to prepare for the trip, like, buy any equipment that you
6 would need for the rally -- clothing or anything like that?

7 A No. I didn't buy anything additional.

8 Q Did you use -- so one of -- I'll represent for you, some of the members of the
9 Proud Boys specifically Ethan Nordean I know did a fundraising event for protected gear
10 and communication devices for the January 6th event.

11 Did you buy any protective gear or communication devices for the 6th?

12 A No, I didn't buy anything. The only thing I bought was a T-shirt, which was
13 a dumb T-shirt.

14 Q Is that the "Enrique Tarrio did nothing wrong" T-shirt?

15 A Yeah, and I was -- because somebody I knew made the shirt, so whatever.

16 Q Okay. You specified that you didn't buy anything for the 6th. Were you
17 given anything?

18 A Yeah. Somebody gave me the radio.

19 Q Okay. And who gave you that radio?

20 A Just somebody in Miami, somebody that I have known for a while. This guy
21 Alex.

22 Q Do you know his last name?

23 A I don't -- I don't know his name.

24 Q Go ahead.

25 A No. Yeah. He just gave me a radio because -- yeah.

1 Q Do you know why he gave it to you?

2 A Well, normally, from experience in D.C. cell phones don't work, so it's good
3 to have a radio, but we didn't -- I didn't use it, but it was there, you know. Who knows?

4 Q Was Alex with you for the November 14th flight to D.C.?

5 A No.

6 Q Okay. Is his name Alex Bouzakis?

7 A No. I don't know who that is.

8 Q Okay. If we can just -- let's pull back up exhibit -- let's look at exhibit 4.

9 So this is, again, the photo of the November 14th in front of the plane, the
10 November 14th. If you can zoom in a little bit, kind of in the center of the photo behind
11 you --

12 A Uh-huh.

13 Q -- there's -- it points to an individual, his name is Alexander, and I know it's a
14 little bit unclear. I could pull up the other photo if we need to, but is his name
15 Alexander Bouzakis?

16 A Oh, hold on. I can't even see --

17 Q Let's pull up the --

18 A Oh. Oh, yeah. I know who you're talking about. Yeah. It wasn't him.
19 I -- I forgot that guy's name was Alex.

20 Q Okay. So different Alex gave you the radio?

21 A Yeah.

22 Q Okay. Can you tell me about Alex? Was he a Proud Boy in your chapter?

23 A Yeah.

24 Q Are you still looking at this photo? It looks like you're concentrating.

25 A Yeah. I was looking at it, yeah, but I see it.

1 Q You can pull down the exhibit.

2 I think you might've been a little distracted; let me just ask you again. So Alex,
3 the one who gave you the radio, was he a Proud Boy in your chapter?

4 A Yeah. He was a Proud Boy.

5 Q Okay. And was he a member of your chapter?

6 A Yeah, he was a member.

7 Q Okay. But you don't know his last name?

8 A He -- all I know is he moved -- he moved out of the -- out of Miami.

9 Q Am I right that a lot of Proud Boys have alternate names, nicknames or
10 handles that they use instead of a real name?

11 A Yeah.

12 Q Did he have a nickname?

13 A Man, what was his nickname? I -- I don't recall what his handle is. Like,
14 he's not really like active. He's -- he moved and I haven't heard from him since.

15 Q Okay. Do you know if he gave anybody else a radio?

16 A No. He gave one to me.

17 Q When did he give you the radio?

18 A I don't recall specifically, but it was -- I don't recall specifically when he gave
19 it to me.

20 Q It was when you were in Miami?

21 A Yeah, it was in Miami.

22 Q Was it after Enrique invited you?

23 A I want to say yes, but I don't recall the specific timeline, but it would make
24 sense.

25 Q When you got to D.C., did other Proud Boys have these radios?

1 A Yeah, some people had it.

2 Q And was there any rhyme or reason to who had a radio?

3 A Just cell phones don't work well. I don't know if you've -- you've
4 experienced -- like, especially with that many people, you can't use your cell phone at all.

5 Q Right.

6 A Even if you wanted to whatever -- they just don't work.

7 Q Had you used a radio like that before?

8 A No, I don't -- I'm not -- I was -- I don't really -- I had trouble using it. I don't
9 even use it.

10 Q I was just going to ask, did the radio actually help you communicate with
11 anyone?

12 A No.

13 Q No?

14 A No.

15 Q Okay. Did you ever talk to anybody on the radio?

16 A No.

17 Q Could you hear -- like, were you set to a particular frequency with other
18 Proud Boys?

19 A There was -- there was supposed to be a frequency, but I wasn't on the right
20 one even.

21 Q Did you hear any communications on the radio at any point?

22 A I -- there might have been like some type of -- it wasn't, like -- it wasn't
23 active. Like, whatever I was on, I don't know. It wasn't -- yeah. I didn't hear a lot -- if
24 anything, I didn't really use it. It was on me, but yeah.

25 Q Did you keep the radio?

1 A No, I don't have it.

2 Q What did you end up doing with it?

3 A I gave it -- I gave it back to --

4 Q To Alex?

5 A Yeah, to Alex.

6 Q Is there any way you would be able to figure out who Alex is? Like, do you
7 have either a text messages or chats or something that you'd be able to identify him?

8 A I assert my Fifth Amendment privileges.

9 Q Okay. Let's move on from the radio for now.

10 Let's see. Do you recall messages from Mr. Tarrio or social media posts for Mr.
11 Tarrio about what you should wear to the rally?

12 A I remember he -- he -- yeah, he mentioned to wear black to -- the premise
13 for that was what he described it as was that it was to -- like, more of, like, a -- a
14 deterrent for Black Lives Matter and Antifa and somebody -- like I told you, I saw
15 somebody get stabbed, so it makes sense to not stand out in a crowd with thousands of
16 people.

1

2 [12:09 p.m.]

3

BY [REDACTED]

4

Q Okay. I just want to understand that a little bit more.

5

A Uh-huh.

6

Q You said a deterrent. Can you explain how it was a deterrent?

7

A Yeah. If -- if people blend in, like, it's -- if you can't be identified by wearing

8

specific colors, then -- then someone's not going to come up behind you or come after

9

you for -- even if you're just walking in the streets on the -- on the side street, getting

10

some food, or whatever. You know, it just makes people less of a target.

11

Q Okay. And how did you hear that you should be wearing black?

12

A Enrique, he mentioned it. I don't recall specifically where he said that, but

13

he -- I remember he made that a point to --

14

Q Okay.

15

A -- well, he said not to wear colors, not -- I know the message that he put out

16

said black, but he didn't really say just to wear black. He just said to wear -- I think it

17

was at his office.

18

Q You think the conversation that -- where --

19

A Yeah, I think it was -- it was at his office.

20

Q Okay. And when was that?

21

A It might've -- probably right before he left to D.C.

22

Q Okay. I guess I just want to understand a little bit more of the timeline of

23

your conversations with Mr. Tarrio about the 6th. And I know, like we said earlier, it's

24

hard to piece these things together 2 years later. So if you just can't remember,

25

obviously just tell me. But I know you had a phone call with Mr. Tarrio shortly before --

1 A Yeah.

2 Q -- the 6th, sometime before the 4th, but within a couple days or a few days --

3 A Yeah, it was short notice.

4 Q Okay. And then was it this conversation that you're talking about with

5 Mr. Tarrio in his office, before the phone call?

6 A I believe it was -- it was after.

7 Q Okay.

8 A It was after. Yeah. He would meet -- like, he was -- he had his office, so
9 he'd print T-shirts, which I didn't see him print too many T-shirts, but he'd print
10 merchandise, and he had his little podcast studio in there, so.

11 Q Okay. So there was the phone call with Mr. Tarrio, and then you met with
12 him in his office sometime after the phone call, but before the 4th?

13 A Yeah.

14 Q Was anybody else at that meeting with Mr. Tarrio?

15 A I don't recall -- I don't recall specifically -- I don't recall specifically what
16 was -- I don't -- like, I -- I know at some point he had people at his office, but I don't
17 remember when it was, or it's kind of a blur.

18 Q Okay. Did you ever had a one-on-one meeting with Mr. Tarrio in his office?

19 A No.

20 Q Okay. So then, there probably was other people present then?

21 A Yeah.

22 Q Okay. And that would've been other Proud Boys, I take it?

23 A Yeah -- yeah. Yeah, sometimes there would be other people show up at
24 his -- at his office.

25 Q Okay. Do you --

1 A But I don't -- I don't specifically, like, I really -- is a blur to me. I don't
2 remember the details.

3 Q Okay. Just because we've talked about him before, was Mr. Fonticoba
4 there for that meeting?

5 A I -- I don't recall, like I don't even, like, I -- I don't recall.

6 Q Okay.

7 A It's --

8 Q That's fine. Obviously totally understand --

9 A Because I don't remember -- I remember being at his office, but I don't -- I
10 don't -- it wasn't like a specific -- he -- he -- people would meet there, like, regularly. It
11 wasn't like a specific meeting. It was, like, I'd go there, and he'd be shooting a podcast
12 or something, and we'd go there and say what's up, and you kind of just stop by and say
13 hi or something.

14 Q So it was just kind of like a hang-out spot?

15 A You could -- somewhat. Yeah, people would go there. And then La
16 Carreta is down the street, so it's, like, a Cuban restaurant, so it was kind of like, stop by,
17 bring some coffee.

18 Q So you recall that you did talk about what you should wear for the 6th, and
19 tell me if I'm wrong, but you said you remembered he said -- in the post he had said to
20 wear all black, but when you talked to him in person, he said just don't wear colors, Proud
21 Boy colors --

22 A Yeah.

23 Q -- just not the yellow?

24 A Yeah.

25 Q Okay.

1 A Yeah. When he puts stuff out, he likes to really, like, dramatize things, and
2 he has his own little persona that he puts out.

3 Q Was the goal -- I know you said that it was to blend in or deter antifa, but
4 was it also part of the goal to look like antifa?

5 A He -- he said that on wherever he said that, but when he spoke to, like, when
6 he gave information to the people locally, it wasn't -- it wasn't about that. It was just
7 to -- to more -- yeah, just to blend in more. But then when he wrote it, it was, Oh, we
8 want to look like antifa, so.

9 Q Let's pull up exhibit 19. So this is a video. And I want -- if you can help me
10 identify who the person in this video is, that would be great. But this is a video taken
11 the night of the 6th in a hotel room, and there's an individual that you'll see on the screen
12 who's talking, and then also in the background, you'll see -- you'll hear Enrique talk as
13 well. So let's try --

14 A Okay.

15 Q From experience, sometimes these videos are hard to hear, so if you turn
16 your volume all the way up.

17 A It's all the way up.

18 Q Okay. And then let's play the video.

19 [REDACTED] Is there any sound? Are you getting any sound?

20 The Witness. No. No sound.

21 [REDACTED] can we make sure the sound is turned all the way up?

22 Still no sound?

23 The Witness. No.

24 Mr. Webb. No sound?

25 [REDACTED] Mr. Webb, do you still have access to that box account that I sent?

1 Mr. Webb. Yes. We did see the video when you sent it earlier this morning
2 with the sound.

3 [REDACTED] Okay.

4 Mr. Webb. You want me to bring it back up?

5 [REDACTED] Yeah. Unless, Mr. Barcenas, are you familiar with the video? Do
6 you know what --

7 The Witness. No, I'm not -- I'm not familiar with what is --

8 [REDACTED] Okay. Let's -- then, yeah, if you could pull up that -- that video.

9 Mr. Webb. Let me -- I pulled it up on my computer in my office, but I'm on the
10 laptop here, so I got to open it -- give me one second if I can pull this off.

11 [REDACTED] I think they dropped off the video. We'll give them a second to see
12 if they can get back on.

13 Why don't we -- let's go into recess until 12:25 and see if they can get back on.

14 [Recess.]

15 [REDACTED] So let's go back on the record at 12:19, and then, yeah, Mr. Webb, if
16 you can play that video.

17 Mr. Webb. Okay.

18 [Video shown.]

19 [REDACTED] Okay. You can pause video now.

20 Mr. Webb. Okay.

21 BY [REDACTED]

22 Q Okay. Just a couple questions about that. First, is that Mr. Fonticoba?

23 A Yes, that's him.

24 Q Okay. Does he have a nickname that he goes by?

25 A I just call him Gilbert. I don't -- I'm trying to think of what -- yeah, just

1 Gilbert. I know some people, when I first joined, they were like, they called him -- not
2 even. It was, like, on -- on the news, they would say, this is his right-hand man. But
3 nobody calls him that. I just know him as Gilbert.

4 Q Sorry. I just -- whose right-hand man?

5 A They would say it was Enrique's, but -- but he -- he's not -- he's not like that.

6 Q Okay. And then in that video, I think you heard -- and tell me if you think
7 I'm mischaracterizing the video, but Mr. Fonticoba said -- pointed out that Nordean,
8 Ethan Nordean, Rufio, was dressed in all black, looked like antifa, and did a good job. So
9 I just want to try to reconcile, you know, it does sound like, at least in that conversation,
10 Mr. Fonticoba and Mr. Tarrío agreed that the assignment was to look like antifa. Did
11 you ever hear anything like that?

12 A Well, after -- the initial thing was to, like, just look -- look nor- -- look -- just
13 blend in a little bit. And then it was -- I guess after he put out that message, or it was
14 then things changed, oh, look like antifa, but it was -- I don't know. I saw that as like
15 a -- like, they were just like, it's, like, not -- not to take it, like, seriously. It was, like, Oh,
16 like, a little thing is using -- is, like, a little game he plays with, like -- he puts things out on
17 social media and people react to it, and it's like -- more like a -- you get a reaction out of
18 people. That's what I saw it as.

19 Q So then just to be clear, the only place you ever heard Mr. Tarrío, or other
20 Proud Boys, say that the purpose of dressing in black was to look like antifa, the only
21 place you heard that was Tarrío's social media post?

22 A Yeah. I think that's where it, like, it originated from as far as I know.

23 Q And then can we pull up exhibit 12.

24 And I'll give you a second to look at this and read this. Just tell me when you're
25 done.

1 And just for the record, exhibit 12 is a post by Enrique Tarrio, discussing wearing
2 all black.

3 Mr. Webb. Can you see it?

4 The Witness. Yeah. Decided to close for 3 days.

5 Okay, I read it.

6

BY [REDACTED]

7 Q Okay. Is that the post you were talking about, where you saw him directing
8 folks to wear all black?

9 A I had -- I don't follow -- I don't have Parler. I don't use -- I don't follow any
10 of his posts, but I'm assuming -- and I don't like to assume -- that there was that post and
11 then, you know, obviously people -- people talk about things after the fact.

12 Q Were there any other platforms that you would've seen Mr. Tarrio's social
13 media posts?

14 A I don't use anything, like, I don't like social media.

15 Q Okay. I'm just trying to understand, like, I thought you had said that you
16 had seen Enrique post publicly, or on social media, about wearing black and blending in.

17 A You know, well, when he posted that, I think that it -- it changed, but I
18 don't -- like, I don't -- like, I hear it secondhand, is what I -- like, Oh, yeah, Enrique said
19 to -- he said this, to wear -- to look like antifa. But, yeah, it wasn't told in person. It
20 was like -- like, this comes out and then people talk about it. It's that people react to it,
21 so.

22 Q Okay. Okay. We can take the exhibit down.

23 Did -- we talked, sort of, at length about Telegram chats you might've been on for
24 November 14th and December 12th? Now I want to focus on Telegram chats that you
25 might've been on related to January 6th. Did at any point you join any Telegram chats

1 that were related to planning for the 6th?

2 A I was -- I was put into chats that were specific -- yeah, they were specifically
3 for the event.

4 Q Okay. And then can you tell me --

5 A Added -- I was added into it. It wasn't like I went out of my way to do it,
6 but I was added in.

7 Q Understood. So for these chats, do you know who added you into the
8 chat?

9 A I -- I don't recall.

10 Q Can you just describe the chats for me or what you talked about?

11 A I didn't really use them, but it was like -- it was -- yeah, it was just more like,
12 Hey, I -- I made it here to D.C., everything's good. Like I -- I don't use chats, like I
13 don't -- I wasn't really active in that, so I can't really tell you, to be honest.

14 Q Okay. That's fine. Just to -- you know, obviously just asking what you
15 recall.

16 Do you remember how many people were in this chat or who, like, what the group
17 was?

18 A I -- I don't know how many people were in there, but it was -- yeah, it was a
19 chat made specifically for the event.

20 Q Did the chat have a name?

21 A Yeah, there was one -- Boots on the Ground.

22 Q Okay.

23 A And it was just -- my understanding, yeah, to say, Hey, look, I'm here, I made
24 it.

25 Q Okay.

1 A You know, like, a head count, more like a tally of who's -- who's [inaudible]

2 Q And then any other -- any other chats about the 6th?

3 A Yeah. There was that -- the MOSD one, Ministry of Self-Defense, but -- I
4 was put into that, but I don't really -- I -- I don't really use chats, like, I don't -- I just was
5 there for the event itself and -- and do my own thing. I don't really care to be
6 with -- with a bunch of people that I don't really know.

7 Q Okay. Yeah. Understanding that, you know, you didn't participate, or
8 minimally participated in the chats. Again, just interested in what you recall.

9 So let's talk about some of those chats a little bit. First, do you remember if you
10 were added to one first, or was it at the same time?

11 A About the same time. I -- I don't recall which one was first.

12 Q Okay. Did they have -- were they all -- it was all Proud Boys in both chats, I
13 take it?

14 A Yeah.

15 Q Okay. Did they have a different purpose? Why were there two different
16 chats?

17 A My understanding was the, like, Boots on the Ground was specifically just,
18 like, to just make sure it was -- it was, like, more like a -- like a head count, like,
19 who's -- who's actually there.

20 Q Okay.

21 A But I don't -- yeah, I guess I don't -- it doesn't really make sense why
22 there was -- be two different chats, but yeah.

23 Q Let's talk about the Boots on the chat ground for a second -- or Boots on the
24 Ground chat for a second. What did that name mean to you, or what did you take Boots
25 on the Ground to mean?

1 A That it was just people that were there, like, I know, like I said previously,
2 Enrique, he has, like, a persona that he -- he -- he likes to portray himself as. And it's
3 a -- I don't know. It just -- just more of, like, an aesthetics thing than anything.

4 Q So to me, Boots on the Ground sounds sort of like tactical or
5 military-oriented. Was that the -- how you would characterize the chat? Were you
6 talking in those ways, tactically about either movements or strategy?

7 A Not that I know of. I didn't really use the chats, like, I wasn't -- but not that
8 I know of -- I -- the brief times I used it, it was like -- it's a lot of people just, like,
9 talking -- they just -- it's like, you know, they're just, like, chitchatting. It's -- it's, like,
10 nothing, nonsense.

11 Q Were you added to the chats before or after you got to D.C.?

12 A I -- it had to be before, because it was before he got arrested.

13 Q Okay. And what day did you fly to D.C.?

14 A I -- I don't recall really that date. I want to say the 5th, but I -- I really -- I
15 don't recall. I'm bad with dates to begin with, so I need to like refresh that in my head.

16 Q Okay. Yeah. We'll -- maybe we'll go through a couple different types of
17 questions and see if it reminds you. Do you remember where you stayed for your trip to
18 D.C. for the 6th?

19 A The Phoenix Hotel.

20 Q Okay. And how many nights did you stay, do you recall?

21 A I know I left the next morning, the day before -- I want to say two nights, but
22 I don't -- yeah, it had to be two nights, but I don't recall, like, I don't remember
23 everything.

24 Q Okay. Yeah. That's okay. Like I said, just let me know if you don't
25 remember.

1 Okay. So you think it might've been two nights and you left the day after
2 January 6th?

3 A Yeah.

4 Q Okay. So then it sounds like you probably -- does it sound right that you
5 arrived on the 4th, stayed for two nights, left on the -- stayed on the night of the 5th and
6 the 6th and left on the 7th?

7 A Yeah. That would -- I don't know. I'm pretty sure, yeah. I really don't
8 recall, but, yeah, I would say that's accurate.

9 Q Okay. That's fine. Let's just then try it this way. What did you do the
10 day that you landed in D.C.?

11 A I went to the hotel, but I don't -- I don't have, like, a visual recollection of it.
12 I know I went to the hotel.

13 Q Okay. And I'm asking specific questions now, really just trying to jog your
14 memory and get you kind of in the mind-set of that day. So, maybe, do you remember
15 how you got to the hotel?

16 A I -- I believe for that day, it was -- I -- I took a train. I took a train in.

17 Q Okay.

18 A From -- yeah, but it was down in -- I believe it was that day. I was -- landed
19 in Baltimore and I took a train. And then -- and then from the train, I don't remember if
20 the train was the train stop outside the hotel, because there's one nearby, or if I --

21 Q I think I might be able to help you. So if you flew into Baltimore, BWI,
22 there's an Amtrak train that goes straight into Union Station.

23 A Yeah.

24 Q That's the big station in D.C., and the Phoenix Hotel is just about a block --

25 A It's right there. Yeah, that had to be --

1 Q Okay.

2 A That sounds right. That's --

3 Q Okay. Did -- was -- were there rallies on the day that you arrived?

4 A Not that I recall.

5 Q Okay. Did you attend rallies on the 5th?

6 A No.

7 Q So, for example, just helping you again, there was a rally at Freedom Plaza.

8 Are you familiar with where Freedom Plaza is?

9 A Yeah -- yeah. I don't -- I don't recall -- I really don't recall what I was -- I
10 don't recall that day too well. I know I was -- I was hanging out. I don't really -- I don't
11 recall. Maybe I was drinking. I don't have a good recollection.

12 Q Okay. We'll revisit that in a second.

13 A Yeah.

14 Q I want to look at -- I want to try to remember some of the conversations and
15 specifics of what was discussed in the MOSD chat that you mentioned. Do you
16 remember what MOSD stands for?

17 A Yeah. It was the Ministry of Self-Defense.

18 Q Okay. And what did that -- we talked about Boots on the Ground. What
19 did Ministry of Self-Defense mean to you? Why was it called that?

20 A That it was for defensive -- the way it was presented was like a -- it's -- it's
21 like antifa or Black Lives Matter. So -- so the premise is that it's self-defense against, you
22 know, antifa or Black Lives Matter.

23 Q Okay. And you said the way it was presented. What do you mean? Do
24 you mean in the chats or --

25 A That was my understanding of what it was and the way I -- when it was

1 created, that's what my understanding was.

2 Q Okay. Did you know anybody else that was in that group chat?

3 A I don't recall specifically.

4 Q How about anybody from your chapter?

5 A I don't recall. I really didn't -- I was in it, but I don't -- it was a lot of
6 garbage. I just didn't -- I didn't use it. Like, I -- I know people just talk -- it was people I
7 don't know talking about, like, garbage, so I had no desire to interact with any of those
8 people.

9 Q Okay. I'll give you the chance to think about the chat for a second, and
10 then try to remember any specific conversations or anything that was discussed
11 specifically. We'll talk about all that generally, and then I'll have some more specific
12 questions for you. So what do you remember about the discussions in the MOSD chat?

13 A It was just, like, chitchat with -- I -- I didn't spend a lot of time looking at it.
14 I saw it was -- initially I saw it was just like -- it was just a bunch of -- it was, like, nonsense,
15 so I just was kind of turned off by it to begin with, and I didn't really use it.

16 Q Okay. What was -- why was it nonsense or what was the nonsense?

17 A It's like -- like -- I don't remember specifics, but I just remember I was looking
18 at it and I'm like, just -- it just -- yeah, there are certain -- it's just like -- it's like a waste of
19 time, to be -- I don't -- they don't want to interact with people like that. So I just didn't
20 use it.

21 Q Okay. And you know what, I apologize that I'm kind of asking similar
22 questions, but I just want to understand the specifics and what you mean by when you
23 say it was a waste of time --

24 A Yeah, it's like people that like -- it's just like -- like, why am I going to chitchat
25 with people about -- like, it's -- it's --

1 Q What was the stuff that they were chitchatting about?

2 A I don't recall. Just -- but, like, little -- people put up stickers and memes
3 and stuff like that. I don't know specifically.

4 Q Was the chitchat about what the plan was for January 6th?

5 A Not that I recall. I didn't -- not that I recall. I don't know -- I didn't really
6 use it, so I don't know.

7 Q Okay. Do you remember --

8 [REDACTED] do you have a question?

9 [REDACTED] Oh, thank you, yeah.

10 BY [REDACTED]

11 Q Look, we've heard from other witnesses that the MOSD chat was started in
12 response to the stabbing on December 12th, in preparation for January 6th. So you
13 don't recall that?

14 A Yeah. It's my first time hearing that. But, yeah, I would imagine, you
15 know, it would be best to mitigate somebody getting hurt or stabbed.

16 Q But you do recall that being discussed in the chat then?

17 A No. I --

18 Q Was it speculation?

19 A I -- I don't recall. Like, I -- I just wasn't really involved in that chat, so I don't
20 know what they were saying. I don't know why it was started specific -- like, for that,
21 I'm not -- I don't know about that.

22 Q So you took the time to download Signal onto your phone, correct?

23 A No. I don't -- I don't have Signal.

24 Q So what was this chat through then?

25 A It was in Telegram.

1 Q In Telegram. So you took time to download Telegram, correct?

2 A Well, I've had Telegram for -- for a long time.

3 Q And you took time to allow yourself to be admitted to this chat, correct?

4 A There's no time on my part for that.

5 Q Okay. And you just didn't read it? You just -- is that what you're saying
6 today?

7 A I was put in the chat, and it's like another chat. It's -- it's just -- I just don't
8 have any interest in that. It's -- I go -- you know, it's like the music festival analogy. If I
9 was in a group chat to go to a music festival. But I want to just enjoy it for myself
10 and -- and be present. Then I'd do that.

11 Q Do you still have these chats?

12 A Huh?

13 Q Do you still have these chats?

14 A No.

15 Q Where are they?

16 A As far as I know, they're -- they're get -- people -- whoever is the
17 administrator just -- can remove them.

18 Q So the administrator removed them from your phone, the chats?

19 A Well, they're not specifically in my phone. It's, like, from the platform
20 itself.

21 Q So you don't have -- I'm asking, though, about your phone. Do you have
22 these chats on your phone still?

23 A No.

24 Q When was the last time you had access to these chats?

25 A It had to be early January.

1 Q Did any Federal authorities or FBI take these chats from your phone?

2 A No.

3 [REDACTED] Okay. Thanks, [REDACTED]

4 [REDACTED] Yeah.

5 BY [REDACTED]

6 Q So I just want to be clear, did you ever delete any chats from Telegram
7 around the 6th?

8 A Not that I recall.

9 Q I want to ask -- I want to ask about some specific things that might've been
10 referenced in the chat, and then you tell me whether or not you remember reading
11 anything in the chat about that.

12 A Okay.

13 Q I also just -- and I just want to take the opportunity to remind you that these
14 chats are out there, they're available, you're under oath right now. And so, when I ask if
15 you recall a specific thing being mentioned in the chat, I want you to think hard about
16 whether or not you saw --

17 A Okay.

18 Q -- something being mentioned.

19 So do you remember anybody ever discussing the Capitol building in these chats?

20 A I -- I don't recall. I wasn't active in those chats.

21 Q Okay. Again, I understand that you weren't active in the chats. I'm just
22 asking you, do you recall any mention of the Capitol building?

23 A Yeah, I don't recall. I really don't.

24 Q Do you recall a mention of plans for where to meet in the morning?

25 A I know there was a place to meet, but even then I was -- somebody that was

1 next to me said, Oh, we're meeting over there, so. I didn't get that from the chat. I got
2 it from --

3 Q Okay. Understanding that you heard about the meeting place from a
4 different source, do you ever remember looking at the chats and seeing anybody discuss
5 where you were meeting?

6 A I didn't use that chat, like, I really -- I had no interest in using it.

7 Q Okay. Again, I understand you didn't have any interest in it.

8 A I just --

9 Q But you did look at the chat, right?

10 A At some point I did and -- and I didn't use it throughout the time I was there.

11 Q Okay. When did you look at the chat?

12 A When it was first created, I -- I, you know, checked it out to see -- see what
13 was it about, who was in it, stuff like that, but I -- it's people I don't know, so it's -- it's -- I
14 have no desire to communicate with people I don't know.

15 Q Okay. Do you ever remember anybody mentioning 1776 in the chat?

16 A No, I don't recall.

17 Q Okay. Do you ever remember hearing anybody mentioning, or using the
18 words "revolution" or "revolutionary"?

19 A I don't recall.

20 Q Okay. After the first time that you looked at the chat and then came to the
21 conclusion that you didn't know the people and you weren't interested in the content, did
22 you ever look at the chat again?

23 A Not that I recall. I may -- I don't know. Maybe I opened it before, but I
24 don't recall specifically.

25 Q Okay. Did you look at the chat on January 6th?

1 A I -- I really didn't use it. I don't -- I didn't get information from the chat, so I
2 don't --

3 Q Again. I understand that you didn't use it, that you didn't look at --

4 A Yeah, but I don't --

5 Q -- but I'm just asking the specific question, did you look at the chat on
6 January 6th?

7 A I don't recall. I really don't.

8 Q Okay. Did you ever look at the chat again after January 6th?

9 A I -- I'm not -- I don't recall. I might've skimmed through some things just to
10 see what, you know, after the fact, just to kind of get an idea. I -- I don't remember
11 anything specifics of anything or -- of really seeing anything that was like -- that was
12 like -- like, really -- was shocking.

13 Q Okay. Do you remember any specifics of anything that wasn't shocking?
14 Anything else?

15 A No. I just -- I -- I -- I skimmed through it, I believe, and it was -- yeah, it was
16 just like -- it wasn't anything -- like, yeah, I don't -- it wasn't any -- it was, like, just to
17 like -- I don't remember specifics of what it was, but it wasn't anything that was, like,
18 concerning to me.

19 Q Okay. Let's pull up exhibit 11. So exhibit 11 is the indictment of
20 Mr. Tarrio and other Proud Boys, including Joseph Biggs, Zachary Rehl, Charles Donohoe,
21 Enrique Tarrio -- like I said, Enrique Tarrio -- Ethan Nordean and Dominic Pezzola.

22 And if we can scroll down to -- actually, let's stay on this first page for now.

23 Do you remember -- I'll represent for you and then you can look at the
24 indictment -- that there were two different -- or at least two different chats titled MOSD,
25 and one of them was created on January 4th while the previous version was deleted.

1 And in the second chat, the second MOSD chat, participants in that chat were
2 ordered to nuke the old chat, as in delete the old chat. Do you remember any directive
3 to nuke the old chat?

4 A Of -- well, when Enrique -- Enrique was arrested, I know somebody was
5 saying, oh -- I don't remember who it was, but I remember seeing that people -- someone
6 said, Hey, delete this chat. And I don't think they were able to because I think Enrique
7 was the administrator, so. That's what I recall, but I -- I might be wrong. I don't --

8 Q Okay. Let's use the indictment and see if we can remind you a little bit of
9 what -- well, let me say this: When Enrique was arrested, was there a new chat created
10 that you were added to?

11 A I don't -- I don't recall being added to a new chat.

12 Q Okay. Let's go down to paragraph 51 and 52. If you can zoom in so that
13 Mr. Barcenas can see the text. That's great. Stay right there.

14 Can you read that, Mr. Barcenas?

15 Mr. Webb. [REDACTED] we have a copy here of the indictment. So it's on page 14,
16 the paragraph --

17 [REDACTED] [Inaudible] of the indictment, yeah.

18 Mr. Webb. Okay. So he'll read it from the hard copy I have.

19 BY [REDACTED]

20 Q Okay. So a couple -- actually, I'll give you a second to read paragraph 51
21 and 52, and just let me know when you're done.

22 A Okay. 51 and 52.

23 Okay.

24 Q So my first question is, I just want to understand, I think you can see from
25 there that there was a new group chat created after Mr. Tarrio's arrest.

1 A Yeah. Yes. Yes, I read that.

2 Q Yep. And then in 52, it specifies that that new group chat, which in the
3 indictment is identified as new MOSD members group, had about 90 participants. Were
4 you part of the prior chat and the new chat?

5 A I -- I don't recall. I recall being in the first one. I don't recall a second one.

6 Q Okay. You -- sorry. Did I interrupt you?

7 A No.

8 Q You recall the first one, and then you said you recall that somebody told you
9 to delete the -- that chat?

10 A They didn't say it to me specifically, but I remember, before going, I looked
11 at the chat and people -- people -- somebody said to -- yeah, to -- to -- that they were
12 discussing Enrique getting arrested.

13 Q Okay. And in that discussion, did they say in the chat, not directly to you,
14 but to all the members of the chat, to delete that chat?

15 A From what I recall, yeah.

16 Q Okay. So then that sounds like that was the first chat, right, if that
17 happened before --

18 A Yeah.

19 Q -- Enrique was arrested or -- that discussion. Okay.

20 And then did you delete that chat?

21 A I don't -- I don't remember. I -- I really -- I don't recall. I don't know what
22 if -- I don't remember if it was removed or if I left it or -- I don't recall.

23 Q Okay. But you said that was before you left for D.C.?

24 A Yeah, it was before I left. I would --

25 Q Okay.

1 A -- I would think.

2 Q Okay. So Mr. Tarrio was arrested on the 4th, so you left for D.C. either
3 later on the 4th, or some later date, the 5th?

4 A Yeah.

5 Q Okay. Do you ever remember seeing the MOSD chat while you were in
6 D.C.?

7 A I didn't look at it really. I -- I didn't use it or look at it.

8 Q Okay. So after the 4th, when you saw that Enrique had been arrested and
9 somebody told you to delete the chats, you don't recall ever looking at that chat again?

10 A Yeah, I don't recall using it or -- or looking at it.

11 Q Do you recall who it was in the chat that said to delete it?

12 A No, I don't -- I don't know -- I don't know all those people, like, I -- I don't
13 know who it was.

14 Q Okay. Do you know anybody that was on the chat?

15 A Not specifically, I don't. I don't recall the specifics of it.

16 Q I just want to ask you about a couple different Proud Boys and let me know if
17 you know them or have ever met them.

18 A Okay. Sure.

19 Q How about Ethan Nordean?

20 A I -- I know of him. I've seen him in person before, but I don't know him,
21 like, I've never talked to him personally or called him.

22 Q Okay. We'll get into this a little bit, but did you march next to him on the
23 6th?

24 A Yeah, I was near him.

25 Q Okay. Do you remember talking to him on the 6th?

1 A No, I didn't have a conversation with him.

2 Q Okay. How about Joseph Biggs?

3 A I didn't know who that was until -- until after the fact. I -- I didn't know
4 who Joseph Biggs was.

5 Q Okay. How about Zachary Rehl, or Rehl?

6 A I don't know who that is either. Like I -- and it was after the fact that I saw
7 his name.

8 Q Okay. Charles Donohoe?

9 A I don't know him either.

10 Q And Dominic Pezzola?

11 A Yeah, I didn't know him either.

12 Q Okay.

13 A Nathan I knew about because he -- he was, like -- I don't know, he has a
14 video that went viral and he --

15 Q The punch heard round the world?

16 A Yeah. So I know him because of that. He had a reputation because of
17 that.

18 Q Okay. Is there anybody else that you similarly knew as kind of like a
19 well-known Proud Boy or influential Proud Boy that we haven't -- that I didn't just name?
20 So I just named for you Nordean, Biggs, Rehl, Donohoe, Tarrio, and Pezzola. Is there
21 anybody else that you think of as similarly well-known?

22 A Minus Enrique as someone who's well-known. Yeah -- yeah, that's -- that's
23 the only ones that come on my mind. There's one guy that plays the guitar that's -- he's
24 kind of goofy, that I've seen him every now and then pop up, but it's not like a -- and I
25 guess Gavin McInnes as well as -- the founder, so.

1 Q Okay. You know, I'm just a little bit confused about, I understand that you
2 attended these events sort of as social events and you were interested in kind of being
3 around the Proud Boys that were there. But you traveled up to December -- or for the
4 January rally alone, and as far as we've discussed so far, you haven't been able to recall
5 anybody that you spent time with or socialized with, including people that were members
6 of your own chapter.

7 So are you telling me that you don't remember anybody that you --

8 A I was -- I had hung out with -- with Bobby Pickles.

9 Q Bobby Pickles?

10 A Yeah.

11 Q And what did you do with Bobby Pickles?

12 A We were -- just walked around. We sold some of the -- he printed those
13 "Enrique Did Nothing Wrong" T-shirts.

14 Q Okay. And is Bobby Pickles --

15 A So we --

16 Q Oh, sorry. Bobby Pickles is a member of a different chapter in Florida, am I
17 right?

18 A He's -- I think technically he's -- he's, like, in West Palm Beach.

19 Q Okay. Is he the president?

20 A He's -- he's not a part -- he's not a Proud Boy at the moment.

21 Q At the time, was he president of the West Palm Beach chapter?

22 A I -- I don't -- I don't recall if he was or wasn't.

23 Q Okay. Let's pull up the indictment again. I want to go through some parts
24 of the indictment that reference specific things in the chat, and we're going to read those
25 together, and you can tell me if it jogs your memory, or you remember seeing these in

1 the chat. Okay? Does that make sense?

2 A Yeah, that makes sense.

3 Q Okay. Let's look at -- and you can -- you can look at your own copy of it,
4 too. Let's pull up, go to exhibit -- or sorry -- paragraph 53.

5 Okay. There's a message from Donohoe, and it reads, "Hey, have been
6 instructed, and listen to me real good, there is no planning of any sorts. I need to put
7 into whatever new thing is created. Everything is compromised, and we can be looking
8 at gang charges. We stop everything immediately. This comes from the top." Do
9 you remember reading that?

10 A I -- I don't recall.

11 Q Okay. You don't remember any mention of gang charges?

12 A No, I don't remember that. I don't remember reading that.

13 Q Okay. On January 5th, if you look at paragraph 55, January 5th at 1:23 p.m.
14 is when the Boots on the Ground chat that you said you were a part of was created.

15 A Uh-huh.

16 Q And do you remember -- like, we've been talking about the MOSD chat for a
17 while, but let's switch gears to the Boots on the Ground chat. Do you remember looking
18 at that chat while you were in D.C.?

19 A The only time I remember using that was, I landed and I just said, hey, I'm
20 here in D.C. But after that, I didn't -- I didn't use it.

21 Q Okay. And do you remember, in either of the chats, any discussions on the
22 5th, or afterwards, about any sort of planning for the 5th or the 6th?

23 A No. I -- to my knowledge, there was no planning.

24 Q Okay. I understand -- we can take the exhibit down for now -- I understand
25 you had a radio. And you said that you had set it to a frequency, but I think you had the

1 wrong frequency. Is that correct?

2 A That's correct. There was a specific frequency, but I -- I didn't have it.

3 Q Okay. Did you set your radio to any frequency?

4 A Whatever it was on. I don't -- I don't know.

5 Q Let's talk about, then, the day -- we can take the exhibit down -- let's talk
6 about January 5th, so the day before the 6th and the attack on the Capitol. What do
7 you recall, if anything, about that day?

8 A I -- I really don't recall much. I don't recall much. I'm walking around D.C.
9 a little bit. I don't -- I don't recall.

10 Q Do you remember attending any events?

11 A No, I don't. Like, I remember just, like, hanging out a lot of time at the
12 hotel.

13 Q Okay. Who were you hanging out with?

14 A I was -- it was of -- I was with Bobby Pickles, just hanging out with him. He
15 came in and, you know, we had some beers.

16 Q Okay. Do you remember anything on the evening of the 5th?

17 A I don't -- I don't -- it's a blur to me. I don't remember.

18 Q Okay. Would you say you were drinking heavily on the 5th?

19 A I don't like to drink too much, but I definitely, I had some drinks, yeah.

20 Q Okay. I'm just asking because --

21 A Yeah, I don't recall what I did.

22 Q I'm trying to understand why you recall so few details of, you know, a
23 relatively significant trip to D.C. and an entire day. And I understand it sounds like
24 basically the only thing you remember at all about the 5th is that you spent some time in
25 your hotel room with Bobby Pickles and walked around a little bit.

1 A Yeah.

2 Q Okay. All right. And do you have any -- did you meet with any other
3 Proud Boys or did you talk to any other Proud Boys on the 5th?

4 A Of -- whoever was around the hotel.

5 Q Okay. You don't recall anybody specifically then, I take it?

6 A No.

1

2 [1:07 p.m.]

3

BY 

4

Q Then why don't you take me through what you remember, the 6th?

5

A On the 6th? We went to go where the President was speaking. He -- I

6

was there, you know, waiting. We're way in the back. I couldn't even see the

7

President. I heard some things, but it was -- it was just a lot of people.

8

Actually, I'm recalling the 5th now. I was selling T-shirts -- I was in Black Lives

9

Matter Square selling T-shirts --

10

Q Okay.

11

A -- with Bobby Pickles, and I ate a pizza and I was -- there wasn't -- there were

12

some people there trying to just like argue with each other. So like, you know,

13

just -- just making fun of that and -- and -- and I was talking to some guy telling him he

14

needs to improve his credit score, just like joking around, but yeah.

15

It was -- that's where I was in Black Lives Matter Square. There's a picture of it

16

selling T-shirts.

17

Q Okay, but that was on the 5th?

18

A That was on the 5th, yeah.

19

Q Bobby Pickles makes T-shirts. Is that right?

20

A Yeah, he makes T-shirts.

21

Q Do you know what he was doing with the money that he made from the

22

T-shirts?

23

A As far as I know it's for himself.

24

Q It's a personal business? Okay.

25

A Yeah. He makes T-shirts, and he decided to make Enrique -- the

1 night -- well, I guess when Enrique got arrested, he's like I'm going to make T-shirts and
2 last minute, he made a bunch of "Enrique Tarrio did nothing wrong" T-shirts. So I
3 helped him sell them at Black Lives Matter Square. And, you know --

4 Q Okay. Did you just do that for fun or were you paid for that?

5 A I wasn't paid for it, but he sold a lot of T-shirts. So -- but I did that for fun,
6 just to help him out.

7 Q Okay. All right. Then let's --

8 A January 6th --

9 Q Go back to the 6th.

10 A My recollect -- my recollection was that -- yeah, I was there. Same thing.
11 I was close to Bobby. We were in the back. We -- somebody was like, hey, we -- we're
12 supposed to meet up over here. So we walked over there.

13 Q And where was there?

14 A I don't even know the specific location. It was -- I want to say the -- the
15 memorial --

16 Q The Washington Monument?

17 A The Washington memorial.

18 Q Is it the Washington Monument? It's the large obelisk that stands in the
19 middle of the mall.

20 A Yeah. We met -- it was like the big -- the big lawn area. That's what -- I
21 don't recall where it was, but we were -- yeah, we met there and there were a lot of
22 people were there and we started walking. Ethan was on the megaphone.

23 Q Uh-huh.

24 A And -- and yeah. We just walked, did a prayer. I think the Pledge of
25 Allegiance maybe. And then we got closer. We walked towards the Capitol, and there

1 were thousands of people walking around us. There were all different types of
2 people -- women, children, yeah. People that showed up to see the President.

3 And then at some point, there was just so many people, people just started just
4 breaking off. And I was with Bobby Pickles. He asked me to -- he made a podcast, so
5 he had a microphone and he was trying to interview people. And he said, hey, what do
6 you think of what's going on and stuff like that? And nobody really wanted to talk to
7 him. They were, like -- there was too much going on to interview people, but I was
8 there helping him film. And then -- yeah. Just kind of -- just was observing -- observing
9 it.

10 And then -- yeah. I was there walking around, observing what was going on.
11 And at some point, I -- it was -- I just somebody was saying oh, Trump says to leave.
12 People just walking by. It was, like, oh, yeah. Go home. And -- and I think there was
13 a curfew. And I was, like, oh, man. I just went back to the hotel. I didn't want to be
14 outside of the curfew.

15 Q Okay. Let's try to break down some of the specifics of that.

16 So you said that you were at the area where the President was speaking. That's
17 the first thing you mentioned, but you were very far back and couldn't see the President.

18 A Yeah. It was -- it was -- yeah, it was far back.

19 Q Okay. Do you know about what time that was?

20 A I don't -- it was -- had to be like 3 or 4 o'clock.

21 Q Okay. So 4 o'clock is about when the President asked people to leave the
22 Capitol, so I think that was probably earlier.

23 A Earlier than that?

24 Q Did you wake up in the -- when did you wake up in the morning?

25 A I woke up and I went straight -- straight up to the event to -- when I got

1 there, there was like a ton of people and -- and, yeah. I just kind of --

2 Q Okay. Let's do this, actually. This will be helpful for placing the time.

3 Let's look back at the indictment. So if we can pull that up, and if we can pull that up on
4 the screen, exhibit 11.

5 Look at paragraph 72. So when you were at the rally, during this time that you
6 just described when you met up with everybody, were you with the group that Nordean
7 and Biggs were part of?

8 A 10:00 a.m., yeah. There was a group of people led by Nordean. I was
9 there present.

10 Q Okay. So then it was earlier in the day?

11 A Yeah.

12 Q And then you marched down the mall towards the Capitol still with Nordean
13 at that time?

14 A Yeah, exactly.

15 Q Okay. Do you remember going to both sides of the Capitol? So when
16 you're coming down the mall and you're looking at the Capitol, you're looking at the West
17 side of the Capitol. Do you remember going around to the other side of the Capitol?

18 A I remember -- there was like -- we walked for quite a bit. I -- I don't
19 remember going around to the other side. I just remember walking -- it seemed almost,
20 like, straight to it, but we walked -- like, it wasn't on a path. It was just kind of like
21 walking in that direction. It took a while, though. Probably like about a 20-minute
22 walk.

23 Q Okay. There are two videos I'd like to look at that hopefully place you and
24 refresh your recollection a little bit.

25 Mr. Webb, is it easiest if you play those videos.

1 Mr. Webb. Yes. Let me --

2 [REDACTED] We can start with exhibit 17.

3 Mr. Webb. Okay. I'll play that now.

4 [Video played.]

5

BY [REDACTED]

6 Q Okay. Couple quick questions. One, does that refresh your recollection at
7 all? Do you remember when and where you were when you took those videos or when
8 those videos were taken of you?

9 A Yeah. That was Amy -- she's supposed to be an AP reporter.

10 Q Amy Harris?

11 A Yeah. She -- she -- her job is to take pictures, so yeah. I took pictures
12 with her. Like, I -- I know a lot of people, you know -- I don't know. I know her. She
13 was in Miami a lot. She was filming.

14 Q My question is just now that you see yourself there, does that help you
15 remember some of your path, because that's on the other side of the Capitol? So not
16 the sidewalk up towards the mall. Did you at some point go around the other side?
17 Do you remember when Amy Harris took your photo?

18 A No. I just remember walking for -- for a while, just going with the group. I
19 wasn't paying attention to where exactly I was going.

20 Q Okay. Do you remember -- in the course of the walk, do you remember
21 when you stopped there to take those photographs?

22 A Yeah. I remember taking those pictures.

23 Q Okay. When was that? Was that at the beginning of the walk, in the
24 middle of the walk, at the end of the walk?

25 A That was more -- more like the middle.

1 Q Okay. And then do you remember where you went from there?

2 A At some point it was -- it was -- we walked toward -- towards the Capitol and
3 it was -- there was like a tower, you know. There's a video of the guy screaming on the
4 megaphone, and he had a big flag and the inaugural strip stage. I just was there for a
5 long period of time.

6 Q Okay. So before that you had taken the photos with Amy Harris on the
7 other side of the building and then you walked back around to the side with the --

8 A Well, I don't recall exactly the whole set up of D.C. and where I was at a
9 particular time, but during what was happening, I was in the same spot for most of the
10 time.

11 Q Okay. So then let's go to the period of time that you're on the other side of
12 the Capitol closer to the mall and you remember the inaugural stage, all the scaffolding
13 that was put up in front of the --

14 A Yeah, I saw that.

15 Q Okay. Tell me when did you start moving towards the Capitol.

16 A I -- I didn't -- I -- I was there for a long time. I saw people -- it was, like, a
17 smoke grenade or something, a flash bang, and people were pushing forward. And the
18 guy on top of the tower was screaming, directing people to move forward. And I was
19 just standing there watching.

20 And then people started filling the inaugural stage. Somebody went on top and
21 threw the American flag down where it was draping over the stage or over the back of
22 the bleachers. And it went on like that for a long time. And then -- and then I
23 noticed -- yeah. It was just a lot of people as far as the eye could see. People were
24 just -- kept going.

25 And I guess -- I walked around a little bit, just for -- just to see what was going on.

1 And -- and I -- I -- yeah. I was just hanging out in that area. There was a music video
2 being shot from Forgiato Blow I think is the name, the MAGA rapper was dancing in his
3 video a little bit.

4 Yeah, just kind of walking around just observing what was going on.

5 Q Okay. Couple questions. Describe to me how close you came to the
6 Capitol building? What was the closest point?

7 A I -- I was near the -- I walked up the stairs just to see what -- what was going
8 on, and I was -- just walked around a little bit and I left.

9 Q Okay.

10 A I never --

11 Q Did you walk into and under the scaffolding?

12 A I -- I was near the scaffolding for -- for like 2 minutes. I was -- I was in that
13 area.

14 Q Who were you with at that time?

15 A I was with Jenna and her husband Robert, I think his name is.

16 Q Sorry. Who are Jenna and Robert?

17 A They were like people from South Florida that -- she's running for some like
18 State rep or something.

19 Q Okay.

20 A I know them from -- from -- just locally here.

21 Q Help me understand or tell me when were you -- when you were with Jenna
22 and Robert, were you also with the Proud Boys at that time?

23 A Yeah. I was -- I was -- I was with -- with another -- with my friend.

24 Q And who's your friend?

25 A I want to take my Fifth Amendment privileges.

1 Q Okay. Did your friend enter the Capitol?

2 A No.

3 Q Okay. Were you with any other Proud Boys?

4 A No. It was -- I was by myself for a while, too. Everyone kind of split up,
5 but I ended up seeing -- I was initially with Bobby Pickles and, yeah, things just kind of got,
6 you know -- things were happening and I just kind of walked around, like, by myself for a
7 while.

8 Q When did you leave Bobby Pickles?

9 A The -- the people were pushing up against the police, the police line, and I
10 was there videotaping and trying to interview people, like I said. And then -- shortly
11 after that, like nobody wanted to talk to him, so I gave him his camera back and he left
12 and I was there by myself for a while.

13 Q Okay. When did you end up meeting up with Jenna and your friend, Jenna
14 and Robert and your friend?

15 A That was -- that was shortly before I left. I ended up leaving. Yeah, just
16 ran into them and -- there were people running away because they were getting tear
17 gassed and some guy had a heart attack that was close by. So Robert went to go help
18 him out. And -- and at that point, yeah, just started leaving.

19 Q Okay. I understand that some of the other Proud Boys that you were
20 originally with did enter the Capitol. Can you tell me why you didn't?

21 A When I saw what was happening, the first thing I thought was, I told myself,
22 do not go in the Capitol, do not in your police officer, and that's what I did. I just -- I was
23 there observing, but I just knew my judgment and intuition told me not to do that.

24 Q Did you recall from either the boots on the ground chat or the MOSD chat
25 that other people that you were with had been discussing the Capitol?

1 A I wasn't really active in those chats. I don't recall hearing people talk about
2 that or seeing it.

3 Q Did you see some of the fighting with the police?

4 A I saw people pushing up against the police line and people with -- you know,
5 crying from tear gas and stuff like that. And a little girl asked me what was going on.
6 So I tried to explain it to her as best as possible what was going on.

7 Q The police line that you saw people pushing against, where was, if you can
8 describe it, where was that police line?

9 A It was probably like, like 300 feet in front of me.

10 Q Okay. And relative to the Capitol building, where was it?

11 A It was in front of the inaugural stage. People were trying to get up on the
12 stage and they were getting directives from the person in the tower. Oh, go on the left,
13 go around the left. There's an opening, go. So I was just watching that unfold.

14 Q Did you know who this person was?

15 A No. I would like to know.

16 Q Okay. One thing I want to go back and talk about real quick is the march to
17 the Capitol. Were you guys marching in a line or do you remember being asked to
18 march in a line?

19 A It was not so much a line, but like maybe like four or five people wide. It
20 was like a rectangular shape.

21 Q What were you told about how you were supposed to march or what the
22 formation was supposed to look like?

23 A Just stay together and don't get separated. There's a lot of people. Some
24 people were walking through or trying to get -- just trying to keep a bunch of people
25 together walking through a crowd is difficult, so --

1 Q Why was it important to stay together as a group like that?

2 A I don't -- I don't know, just that's what -- you know, it's like -- it's -- that's
3 what people were doing. I don't know.

4 Q Did anybody specifically that you remember tell you to stay in that
5 rectangular formation?

6 A Well, Ethan was on the megaphone, so he was primarily the person or
7 Nathan.

8 Q Ethan.

9 A Ethan. He was primarily the guy giving directions.

10 Q Okay. But you didn't know before hand; it was just him in that moment
11 telling everybody to stay together?

12 A Yeah.

13 Q Did you have any conversations about how you should march on the mall?

14 A No. It was in the moment.

15 Q Okay. So you're on the Capitol near the inaugural stage and I understand
16 you're seeing some tear gas going off. What caused you to leave the Capitol grounds?

17 A I heard about a curfew and I heard somebody saying -- I guess it was an older
18 lady just saying, oh, Trump tweeted to go home, and -- and I just kind of -- it just seemed
19 like the right time. And I didn't want to be involved with any curfews and being stuck at
20 walking. It's a long walk back. So I just left.

21 Q Okay. Who did you leave with?

22 A I think I was by myself. I just -- I left -- I got stored up with -- with who I
23 was -- with Robert he went to go attend that -- there was a guy, from what I understand,
24 he had a heart attack, so he went there and I -- we walked out to the street.

25 There was like a -- like a -- not a roundabout, but it was like a dead end kind

1 of -- like a circular street. And then we went there and there was just -- I don't
2 know -- people standing around. Some lady talking on a megaphone, talking about
3 whatever, and, yeah, just left, went back to the hotel.

4 Q At what point did you leave -- you discussed a friend that you didn't want to
5 identify, at what point did you leave that friend?

6 A I -- he was helping -- he was helping the guy that that was -- that was
7 having -- that was having a heart attack. So they were there and I left. So at that
8 point -- at that point I just -- yeah, we just kind of split up at that point.

9 Q I think you also said that your friend Robert of Jenna and Robert also went to
10 help the guy that was having a heart attack.

11 A No. Jenna, I made sure she got out safely, but -- but --

12 Q Maybe I misheard you earlier. I thought you had said that Robert had gone
13 to help the guy with the heart attack.

14 A Yeah. Robert went, but Jenna was helping out.

15 Q Okay.

16 A I helped her get out safely because there was people -- it was just a hectic
17 environment.

18 Q So Robert and the friend who you don't want to name are the two left, and
19 then you helped Jenna get out of there?

20 A Yeah. And I was waiting around saying, hey, where's Robert? I wanted to
21 make sure she was with her husband.

22 Q Okay.

23 A And it took a while and eventually I just said, I'm leaving and I left.

24 Q Okay. And again, I just want to understand sort of the scope of your Fifth
25 Amendment assertion related to your friend. Is it just his identity that you're refusing to

1 provide today?

2 A Yeah. I just -- I don't feel comfortable, you know, talking about my friend.

3 Q Yeah. I want to make clear -- so the assertion of the Fifth Amendment has
4 to be for the specific reason that you believe that giving that information would -- could
5 be used against you in a criminal prosecution. I understand that sometimes it's hard
6 and it's uncomfortable to identify people that you just don't want to, but unless you think
7 that your connection to this individual tends to show that you've committed a crime, then
8 you need to give the name of the friend.

9 Mr. Webb. He's going to assert his Fifth Amendment privilege.

10 [REDACTED] Okay.

11 BY [REDACTED]

12 Q Let's discuss what you did as you left with Jenna. Where did you go with
13 Jenna afterwards?

14 A I went up to a street. Like I said, I was waiting for her to be reunited with
15 her husband and eventually -- it took a while. And eventually -- I don't know if she
16 actually followed or not, but it got to the point where I was just -- I left.

17 Q Okay. Where did you return to after?

18 A I went back to the hotel.

19 Q And what did you do that night?

20 A Sat around. Somebody ordered a pizza. Somebody I didn't know ordered
21 food. I sat there, I ate, I had a few drinks, and -- yeah. I was just listening to -- maybe
22 just having conversations with people and then I went to sleep.

23 Q Okay. Do you remember any of the people that you had conversations
24 with that night?

25 A There were -- they were just, like, hotel guests that -- I didn't know who they

1 were. They ordered the pizza and there was -- the news was on -- the TV was on. I
2 don't know whether it was CNN or something like that, and watched a little bit of that.
3 And, yeah, I was tired. I went to sleep.

4 Q Okay. Let's take -- it's 1:36, let's take a 5-minute break and we'll come back
5 at 1:41.

6 [Recess.]

7 [REDACTED] We are back on the record at 1:45 p.m.

8 BY [REDACTED]

9 Q Just a couple other quick questions about your experience on the day of the
10 6th.

11 Do you ever recall while you were marching or during the period of time that you
12 were close to the Capitol being split up into teams or being put on a team with any of the
13 Proud Boys?

14 A No. I was never put on a team or told that we're going to split up.

15 Q Okay. Did you ever hear anybody discuss splitting up or divvying up into
16 teams?

17 A No. I hadn't heard anything.

18 Q Either on the MSOD chat or the boots on the ground chat or any other chat
19 or just in conversation, did you hear about any Proud Boys sharing any documents on
20 your January 6th plans?

21 A I didn't see any documents.

22 Q Okay. The one I want to ask you about specifically, if you pull up the
23 indictment again quickly, we can look at paragraph 41.

24 And while you're looking at it, for the record, I'll just note paragraph 41 says that
25 between December 30th and December 31st, 2020, Tarrío communicated multiple times

1 with an individual whose identity is known to the grand jury. On December 30th, 2020,
2 this individual sent Tarrio a nine-page document titled "1776 Returns."

3 The document set forth the plan to occupy a few crucial buildings in Washington,
4 D.C. on January 6th, including House and Senate office buildings around the Capitol.

5 Are you familiar with this 1776 Returns document?

6 A No, I'm not. This is my first time seeing this.

7 Q Okay. Did you ever hear anybody discussing entering or occupying the
8 buildings on the Capitol grounds?

9 A No.

10 Q I think you -- we can pull down exhibit 11.

11 I think you started to answer some of these questions with [REDACTED] but I
12 wanted to ask you about the interaction with the FBI or DOJ.

13 Have you ever been interviewed by any law enforcement related to January 6th?

14 A No, I haven't.

15 Q Has anybody from FBI or DOJ reached out to you anyway?

16 A No. No.

17 Q Okay. And then I want -- we're almost done here, but for the record, I need
18 to just, again, clarify and understand the couple items that you didn't want to respond to
19 based on the Fifth Amendment privilege, and I'll just describe to you as I did at the
20 beginning of the interview that for items that you are or for topics that you are choosing
21 to assert the Fifth, you need to have a good-faith basis that divulging that information
22 could be used in a criminal prosecution against you.

23 If you choose to assert the Fifth Amendment about those topics, we have the
24 option of going to the chair of the committee and asking for a ruling on your assertion of
25 the Fifth Amendment. And if your objection based on the Fifth Amendment is

1 overruled, then you'll have to provide that information.

2 So right now I just want to create the record of exactly what it is that you are
3 refusing to answer, so if at a later date, we decide to have the chairman rule on that, we
4 can return to the issue. We'll leave this deposition open so that we have the option of
5 bringing you back to answer those questions if the chairman rules.

6 A Okay.

7 Q Is that understood?

8 A Yes, I understand.

9 Q Okay. So the first issue I think that you had asserted Fifth Amendment on
10 was the identity of the leader of your or actually the president of your chapter, the Vice
11 City Proud Boys. Is that correct?

12 Mr. Webb. Yes.

13 The Witness. Yeah.

14 [REDACTED] And you're continuing to assert your Fifth Amendment on the topic
15 of the identity of the leader of the Vice City Proud Boys?

16 Mr. Webb. Yes.

17 The Witness. Yes.

18 BY [REDACTED]

19 Q And then same for the president or leader of the Broward County Proud
20 Boys?

21 A Yes.

22 Q Okay. We also discussed an individual whose first name is Alex who gave
23 you the radios or the radio, and I believe -- is it still correct that you don't recall his last
24 name?

25 A Yeah, I don't recall his last name.

1 Q Okay. And do you recall his nickname?

2 A Man, I don't recall -- I just know he moved. He moved to northern Florida.

3 Q Okay. And I asked you if you have either text messages or Telegram chats
4 or any resource that you could refer to to figure out his last name.

5 Do you remember that question?

6 A I can -- I can see if I -- I can get that information.

7 Q Okay. So that's all I was asking earlier was, would you have a way to figure
8 out what his last name is?

9 A I can -- I can see if I can find out.

10 Q Okay. How would you go about finding out his last name?

11 A I can reach out to him personally.

12 Q Okay. So you have contact information for him?

13 A Yeah, but I don't talk to him. He's not really -- he's just -- he just has a
14 radio, a guy that had a radio. He's not like some -- you know, anything special. He's a
15 guy that had a radio, said you want to use this.

16 Q Understood. How would you reach out to him if you were going to? Is it
17 through Telegram or phone?

18 A No. I have his phone number.

19 Q Okay. You have his phone number? Then I'm going to ask you to provide
20 his phone number instead and then you don't have to reach out to him. I can figure out
21 who he is based on his phone number if you can provide his phone number.

22 A Okay.

23 Q Okay. So do you have your phone with you? Can you do that now?

24 A 

25 Q Okay. Great. Thank you. And then the last kind of topic that you had

1 asserted the Fifth Amendment on was the identity of your friend who you were present
2 with near the Capitol with. Is that correct?

3 A Yeah.

4 Q Okay. I just had a couple questions about that friend. I think I asked you
5 earlier, do you know if he's been charged or indicted with any crimes?

6 A No, he hasn't.

7 Q Okay. And did he enter the Capitol?

8 A No, he didn't.

9 Q Okay. I guess, for the record, is it -- well, let me ask the question: Is it
10 that you're just uncomfortable providing the name of a friend because you don't want to
11 get him involved or is the assertion that providing his name could be used as evidence
12 against you in a criminal case?

13 A So I can tell you he -- there's pictures of me and him next to each other.
14 His name's Al, but it's -- it's -- he didn't do anything wrong. He didn't trespass or --

15 Q Again, my questions are not meant to make any accusations about having
16 somebody done something wrong, we really are just trying to understand who was there,
17 what they were doing, placing different people around the Capitol at different times, and
18 just understanding how the events that day unfolded.

19 So I think you just said -- did you just name the friend? You said his name is Al?

20 A Yeah. There's pictures online. I'm sure you've probably seen them.

21 Q And you said that Al is a Proud Boy?

22 A What's the question?

23 Q You said Al is a Proud Boy, one of the Proud Boys?

24 A He's -- he was with the organization, yeah.

25 Q Okay. And is he a member of the Florida chapter?

1 A Yeah. He's -- he's in Broward.

2 [REDACTED] Okay. Okay. Then I think some of my other colleagues who have
3 joined the call may have some follow-up questions for you. Let me check and see if
4 that's the case.

5 [REDACTED] or anybody else, do you have any questions for Mr. Webb?

6 [REDACTED] Hey, [REDACTED]

7 BY [REDACTED]

8 Q Thanks so much for speaking with us today, Mr. Barcenas.

9 I just had a couple of follow-up questions kind of building on the conversation that
10 you were having with [REDACTED] mainly some of the conversation you were having
11 earlier, not particularly about the activities that you had that you went through on the
12 day of the 6th?

13 And I guess my first question is, is just clarifying a timeline question and sort of
14 why you were initially attracted to the Proud Boys. You said you joined in
15 September 2020. Is that correct?

16 A No. It was like -- did you say September?

17 Q Yeah. You said it was shortly before the debate.

18 A Oh, yes. I thought you said December. September more or less, yeah.

19 Q So was there anything going on in the country that made you want to join
20 the Proud Boys at the time?

21 A Somebody just -- they -- they proposed, hey -- it was like somebody I knew
22 just asked me and he was -- he was doing rallies and he would put pictures up on
23 Facebook and social media, so it just looked -- it was, you know, something -- it was -- it
24 was just, you know -- he was politically active. He was a candidate running for a position
25 in Sweet Water, and I don't know. It just -- it seemed fine to me, like, you know, go to

1 rallies and having a sense of like a brotherhood fraternal organization.

2 Q Yeah. I totally get the sense of fraternity that you mentioned a couple of
3 times throughout the exchange with [REDACTED] And I suppose I'm curious about the
4 other part that you were discussing going to rallies and supporting political candidates.

5 On that lens, the more political side of things, what would you say was the mission
6 of the Proud Boys?

7 A I don't think there was a mission. It was more of a -- it was -- it was -- it
8 was just something we hang out and -- and -- it's like -- it's a western chauvinist club.
9 So, you know, we're promoting western values and stuff like that, so --

10 Q That's actually where I was going to go next. I was hoping that you could
11 explain to me a little bit more about what western chauvinism means?

12 A Yeah, sure. It's pro-capitalism, pro-free speech, pro-second amendment,
13 venerating the wife so she had the option that she could work or not work, but she
14 shouldn't be shamed if she chooses not to work. And, you know, dedicate more time to
15 the family.

16 Yeah, just -- you know, the foundations of Western civilization and -- yeah.

17 Q So these are all values that you associate with Western civilization. I guess
18 I'm a little curious. What do you think are the foundations of Western civilization?

19 A Free speech. Like I said, pro-Second Amendment, capitalism is a big one,
20 yeah, just -- like I said, democracy.

21 Q And in these conversations, how were you and other Proud Boys talking
22 about the scope of Western civilization?

23 A It's what I just said. It's the tenets of the organization.

24 Q Sure, no. I mean, you're talking about defending Western civilization,
25 promoting these values that you say are essential to Western civilization. Who is part of

1 Western civilization?

2 A American citizens. I would say even some of the Latin America, you know.
3 Pretty much everyone except like -- like here in Miami, Cuba is notorious Communist
4 dictatorship. So -- so when there's something happening in Cuba, it's nice to have a
5 group of people to be around that we can go to rallies and support the Cuban people.
6 So just -- it's stuff like that.

7 Q Yeah. Understood. I wanted to circle back to something you said earlier.
8 You said that Western civilization is everybody except -- and then you kind of trailed off.
9 So I was wondering --

10 A The Communist regimes. That's why I went to Cuba. CCP,
11 these -- North Korea, you know, things that are -- their objective is to -- they're like
12 totalitarian regimes that suppress people and -- and -- and, you know, have a ton of
13 human right violations and stuff like that, so --

14 Q That makes a lot of sense.

15 Do you think there are American politicians who are Western chauvinists?

16 A I -- I don't want to speculate on -- no. I don't know how to answer that
17 question. I can't make assumptions like that.

18 Q Sure. I was sort of asking because I was wondering if Proud Boys discussed
19 leaders in government who supported their political beliefs as you have been discussing
20 them.

21 A Well, nobody I know specifically that would unless they came out and like
22 they described themselves as that. And I can't make assumptions.

23 Q So you never talked about whether President Trump was a Western
24 chauvinist?

25 A No, never had that conversation.

1 Q So zooming out a little bit from that --

2 A Uh-huh.

3 Q -- what do you think are the threats to these foundations of Western
4 civilization?

5 A Yeah, just -- I would say people really promote like candidates -- well, it's
6 like -- they're heavy on socialism and getting involved in wars that we shouldn't be
7 involved in, and stuff like that. There's a lot of warmonger politicians that always want
8 to get into the next war, so --

9 Q So how -- you mentioned earlier in your conversations with [REDACTED],
10 Antifa and Black Lives Matter.

11 A Uh-huh.

12 Q How do you think they factor into that universe of threats?

13 A Well, Antifa is -- is organization that they're anarchists, for the most part and
14 I guess some are Communists. Black Lives Matter for sure is an organization that they
15 deceived a lot of people. I think a lot of people had good intentions when they say I
16 support Black Lives Matter, but a lot of things -- like, these people -- they like to
17 twist -- twist their words and twist the narrative of what actually they represent.

18 And you've seen the lady, she -- one of the organizers bought like five mansions
19 and she -- they don't donate to anything that helps the Black community and nothing
20 they do actually contributes to making the Black community stronger.

21 It's -- it's -- it promote ideas of socialism and Communism and it's -- if nobody calls
22 them out, then it just keeps going.

23 Q So was part of what the Proud Boys meant to do calling them out?

24 A I wouldn't say as an organization thing, but there's some representatives
25 that can -- very few representatives that -- that will make a statement defending -- you

1 know, going against the Black Lives Matter movement.

2 Actually, now I don't even think it's that. After the people have seen that these
3 people have robbed them and taken their donation money to misuse it and they kind of
4 can see the true colors of what that organization is, I think it's lost a lot of pull and, you
5 know, they're on to the next -- the next thing whatever that is.

6 So right now I don't think Black Lives Matter is -- it's kind of, like, old news in a
7 sense.

8 Q But when you joined the Proud Boys in sort of September 2020 around
9 there, obviously that would have been after a summer of a lot of protests by Black Lives
10 Matter groups.

11 A Yeah.

12 Q And there also had been quite a lot of activity between Proud Boys and I
13 would say Antifa or I think that was described as Antifa activists at some of those protests
14 in the Pacific Northwest also in the country, how did you see Antifa's role in those events?

15 A Well, between what happened -- I'll start with Black Lives Matter. Was it
16 Kenosha the were burning -- there was videos all over the news, all over the internet.
17 They were burning buildings. They were -- the whole George Floyd, which is sad. You
18 know, I don't like when anybody dies in any circumstance, but, you know, they reacted as
19 a movement in a violent and -- and -- and malicious way.

20 And there are people that support that, oh, no. That's what they do. They just
21 burn down buildings and loot small businesses, and I think that's wrong as a society.
22 Antifa is -- that whole Seattle, the CHOP zone, whatever, CHAZ, that, too, is something
23 that's horrible for society.

24 I don't think people should tolerate it, the -- the -- the mayors of the city shouldn't
25 allow their -- these un -- whatever they call it, unauthorized -- autonomous zones in their

1 cities. It's -- I just don't think it's healthy for society and unfortunately, people pander to
2 that stuff and it's not -- it's not good.

3 Q So you're talking about some pretty serious threats and you just mentioned
4 folks pandering to them. I know earlier you kind of expressed fear that some politicians
5 don't want to counter threats like socialism, more words of adventure as you mentioned.

6 So do you think that America's system of government is able to defend against the
7 threats you're talking about?

8 A I haven't -- I haven't said any threats. Those are factual statements that
9 there are -- there are, you know, they pander to these people and they do it for votes. I
10 don't know if they do it to be in with a certain crowd. I don't know the premise for it,
11 but they -- they -- they openly support these type of movements in their cities, and I think
12 it's just wrong.

13 Q So how do you think our government should change and our leaders should
14 change so that we can defend against these threats?

15 A That's a good question. I think it comes down to people are just voting for
16 the right candidates and getting the right people into power that --

17 Q Have the Proud Boys ever expressed interest in being candidates
18 themselves?

19 A I know there was -- like, Pedro ran for a commissioner seat I mentioned
20 before.

21 Q Uh-huh.

22 A But, you know, there's -- a lot of people are lazy. They wouldn't -- but I
23 encourage anyone who wants to get involved in politics to do it instead of sitting on the
24 sidelines and complaining that nothing's happening or no one -- the wrong person -- they
25 don't have options to vote for or whatever their -- their excuses are.

1 Q Definitely. More broadly, I guess, how do you think American society
2 should change to respond to these threats?

3 A I think American society needs to come together and accept their differences
4 and look -- the gas prices right now are going to be like \$7 pretty soon. There's just a lot
5 of bad things going on in this country and it's hurting -- it's hurting the lower income
6 people the most, middle class people.

7 So I don't know. I'm not going to say I have the solution to how to fix major
8 issues in the United States. Inflation. We've just had a pandemic that potentially there
9 might be -- who knows if there's another one is going to happen, people don't know
10 what's going on with that.

11 Oil prices are high. Food prices are going up. Inflation is -- is growing faster
12 than wages. It's a lot of issues and yet -- am I the one that has the best answer for that?
13 I don't think I'm the person to say there's one solution for all those issues.

14 Q Yeah. Understood. Does the idea of stress testing the government mean
15 anything to you?

16 A No. I -- I think people should get involved and if they want to make a
17 change in their community, they need to physically go out and be apart of it.

18 Q But had you ever heard that specific phrase, stress testing the government at
19 all?

20 A No. I've never heard of it.

21 Q Okay. Thank you.

22 To close out this portion of the conversation, I guess I'll ask again, what do you
23 think the Proud Boys' role should be or is or has been in terms of helping America combat
24 these threats?

25 A I think the -- it's -- it's a fraternal organization that promotes Western values,

1 free speech, pro-Second Amendment, capitalism, for the most part, that -- that are able
2 to kind of make men that join make them better people. So that's -- that in itself is an
3 institution that -- that is gone for most part in our society; that there's not camaraderie
4 between men and attacks on the Boy Scouts and even within some colleges, they're going
5 after the fraternities and stuff like that.

6 So -- I think it's something positive for society to have -- to have men that, you
7 know, can get-together and express themselves in a positive way.

8 Q Yeah. That makes sense.

9 So moving away a little bit from that. I'm curious, where do you go to for your
10 news? You mentioned Twitter for news a little bit before, but if there are any other
11 sources?

12 A I try to stick with business news, so Twitter sometimes I look, but not really.
13 I use that more for like cryptocurrency projects I like to look at and see what they talk
14 about.

15 Q Are there any particular media figures that you trust?

16 A The only guy I really like is Tucker Carlson. I think he does a good job at
17 what he does and he's --

18 Q Why is that?

19 A He's -- he's -- he's just -- he just says it as it is. He's -- he's good at what he
20 does. He's honest and presents things as they are.

1

2 [2:16 p.m.]

3

BY [REDACTED]

4

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Q And that conversation about Western civilization we had earlier, does that factor into your support of Tucker Carlson, your like of Tucker Carlson?

6

7

8

9

A I see him, like, he's -- he's obviously more on the conservative side, and I think that's what it really comes down to is conservatism and -- and -- and, you know, and not going into all these -- things haven't changed a lot in 2,000 years as far as human nature goes, or, whatever, how many thousands of years, so I just --

10

Q Does it -- oh, go ahead.

11

12

13

14

A Yeah, I think people try to -- or try to twist human nature the way things are, as far as confusing kids on their gender and stuff like that. And they're really messing with the kids most importantly, so. I think Tucker Carlson is -- is one guy that -- that talks about those issues.

15

16

17

Q That actually brings up an interesting point. You kind of highlighted your Western values, and you mentioned conservatism. And so I wonder if those two things are equated in your mind in terms of our contemporary politics.

18

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A I think they are related. I think -- like I said, some things don't change. Human nature hasn't changed since it started, so for us, as a society, to function in a proper way, I think it's good to -- to acknowledge that, that we are people, we are, you know -- we are, you know -- we have certain values that just don't change, and they shouldn't change because somebody on TV tells you that -- that you need to call them by a certain pronoun or something like that, or all this crazy stuff that they're -- oh, it's a new theory that we made up and now you need to act like this. It just -- it's not healthy for society.

1 Q So in your time at Proud Boys, at meetings or other events, did you discuss
2 things like gender norms often?

3 A No. At meetings, it's just -- oh, you want to go do a rally here. It's boring
4 stuff. It's not, like, an open conversation about anything in particular about current
5 events or stuff like that.

6 Q But the rallies obviously were in support of candidates who were espousing
7 certain things, right?

8 A Well, we never really support candidates.

9 Q Okay.

10 A Usually, the rallies were just -- I've done a rally before, I don't know if you're
11 familiar with May 1st as May Day.

12 Q Uh-huh.

13 A It's a -- it's like a communist holiday. It's a labor, whatever they call
14 it -- look it up, May 1st holiday. But it's a notorious communist holiday. So I've held a
15 rally that's on May 1st at the spot where the communists like to meet up in front of the
16 Simon Bolivar statue in Bayside, downtown, and they were upset that I took their spot
17 and had a rally that was a pro America, pro freedom rally on -- on their holiday. So stuff
18 like that, you know, it's, like, their little --

19 Q So your presence is meant to signal a specific kind of Western values, as you
20 say?

21 [REDACTED] You might've cut out for a second.

22 Mr. Webb. Yeah, we just cut out for a second.

23 [REDACTED] -- and I --

24 The Witness. Yeah. It's in and out.

25 [REDACTED] Okay. Sorry about that. Let me know if I'm --

1 The Witness. It's better now.

2 [REDACTED] Okay. Cool.

3 Well, also, [REDACTED] let me know if I am flickering. So I was asking --

4 The Witness. He was check- --

5 [REDACTED] Uh-oh.

6 The Witness. You're good now.

7 BY [REDACTED]

8 Q All right. Great. So I was asking, does Proud Boys' presence at an event
9 like you just described, May Day, was that meant to signal support for Western values as
10 we were talking about earlier?

11 A Yeah. It's pro freedom, pro America, pro Western values. America is
12 founded on Western values, so, yes.

13 Q And is that kind of similar to when you showed up outside the polling place
14 in November 2020?

15 A Well, it wasn't, like, at the polling place, but it was the side of the street, just
16 waving a flag --

17 Q Right.

18 A -- just encouraging people to vote and then, you know, show support for the
19 process.

20 Q So what would you say to folks who aren't in the Proud Boys, who criticize
21 the organization as a white nationalist group?

22 A Yeah, I think that's a media spin that -- that it's -- it's unfortunate
23 that -- that -- but that's the way it is. The -- the media and political activists, they -- they
24 like to twist things to their own narrative. So it's unfortunate that it's like that, but
25 that's the nature of -- you know, you can't be mad at a -- it's a scorpion and toad story.

1 You can't be mad at the scorpion for stinging the toad. It's what they do.

2 Q Why do you think the Proud Boys in particular have attracted that kind of
3 attention?

4 A In particular, I think they -- are you still there?

5 Q Yeah, I'm still here.

6 A Okay. They've attracted that type of attention. It's -- sometimes the
7 wrong people -- I -- I don't even -- I don't specifics for why that would -- it would be
8 portrayed like that, but -- but -- I don't know. It's a just kind of -- it's a fluid thing, so
9 it's -- it's always changing, depending on -- on what's going on.

10 Q Uh-huh.

11 A But I know, yeah, like, the -- some of those rallies that -- that were taking
12 place about 2 years ago -- a little more than 2 years ago, it -- you know, something
13 happens and then automatically, oh, this is the way things are, and that's what the story
14 becomes, and it's not really --

15 Q Can you give -- can you give an example of one of those instances?

16 A I'm not the best person to give examples of that.

17 Q Sure. Well, I guess on that same general time period, did you participate in
18 any rallies against COVID lockdowns when you joined the Proud Boys?

19 A I was involved, as I mentioned previously, I was asked by a group of moms to
20 help them protest the -- the masking in schools, so -- which we know now is that masks
21 aren't effective and that -- that especially kids are not affected by COVID-19. So, yeah, I
22 was asked by -- by a group of moms that they felt like they were going to be attacked for
23 doing, with holding an event like that. So I put it under my name, and I was attacked for
24 it.

25 Q Do you know if Proud Boys are still sort of active on these issues of COVID

1 restrictions and masks -- masks in schools?

2 A What was the question?

3 Q Are Proud Boys still organizing around these issues surrounding --

4 A It's different from -- from -- from chapter to chapter, so I can speak locally
5 that -- that I don't -- we've kind of taken a step back on a lot of things. And it's
6 unfortunate that, you know, people do like the -- like to have people there to where they
7 feel they're -- they have some type of safety and protection if they get harassed or
8 somebody there to stick up for them, so -- so it's unfortunate that we don't really do
9 anything right now, but we -- we have in the past, and we've been thanked a lot for -- for
10 being there, showing our support in different type of rallies and -- yeah.

11 Q And this also might be a little before your time, and we were kind of talking
12 about this earlier, but did you participate, yourself, in any events surrounding BLM
13 protests in the summer of 2020?

14 A No, I wasn't involved. The only thing I did was in Washington, D.C., I
15 physically walked into the Black Lives Matter -- they had like a party, but I went there
16 myself, and I got some food and talked to some people.

17 Q This was in December?

18 A It was in -- I did it in November and December.

19 Q Okay.

20 A But I --

21 Q What was it like talking to people there?

22 A They didn't talk too much, but it was -- they gave me some candy and stuff.
23 They set up a table. They were about, like, communal sharing stuff. So they gave me a
24 candy bar and -- and, you know, it's -- we had some, like, some sourdough -- homemade
25 sourdough bread and some noodles, and it wasn't -- it wasn't the best food, but, yeah, it

1 was -- it wasn't anything -- just really dark, very dreary. Everyone's kind of in just -- in
2 their little groups. Very -- very depressing atmosphere, I would say.

3 Q Why do you think that was?

4 A That's just the kind of people they are. They just -- it's like -- yeah, they
5 were playing music, but, like, one guy was dancing. Just that's -- that's what they value.

6 Q Sorry. I got a little confused there. What do you mean by that?

7 A That's like what they're about, very --

8 Huh?

9 Yeah, it's like a -- like a -- it's just like -- I don't like to use the word vibe. It
10 sounds like a hippie or something. But it's, like, kind of what they put out, that they're
11 very -- they're just -- I don't know how to describe it. They're -- they're not very -- they
12 just, as a community, they're just like -- like, low-level values. They just -- they
13 don't -- they're not -- they don't have any sort of -- they're not very social, like, it's
14 very -- they keep to themselves and -- and, yeah, that was my experience there.

15 Q And this is about Black Lives Matter as a organization or something broader?

16 A Well, that specifically was Black Lives Matter Square in Washington, D.C.
17 They -- they promote, like I said, they were giving out free food. It was a communal
18 thing, so I give you free food, and then you give me something, almost like a barter
19 system, and they're promoting, that's what they want society to be like. They want it to
20 be -- it's like a microcosm of what they want society to be like, so. That's what I
21 experienced with them.

22 Q So the sort of candy-sharing was, in your view, anti-capitalist microcosm?

23 A Yeah. Yeah, candy, free food. And they said it too. Somebody wanted
24 to offer them, oh, here's money, and they're like, no, no, it's -- you know, it's free, take it.
25 But, you know, on a large scale, that would never work out. It might work at the candy

1 bar level, but on a larger scale, I don't know it would work out.

2 Q That sounds pretty friendly, but you were saying it was dreary?

3 A Yeah. The environment was dreary. They -- they just huddled together
4 really close to one another and --- I talked with them a little bit, but it was like, I don't
5 know, they just -- I could talk about this forever, and I don't -- I don't know it's -- if
6 it's -- now's a good time to just ramble about -- about this.

7 Q Yeah, no, I agree. I just was asking to clarify.

8 I wanted to follow-up also on one specific thing that you said to [REDACTED] earlier
9 today about the September debate with President Trump and President Biden. And you
10 had asked -- you were asking -- sorry.

11 He was asking you about President Trump's stand back and stand by comment,
12 and you said you didn't think it was a big deal, and you thought that was actually just
13 Trump telling people to stay calm. And so I guess I'm wondering, why do you think he
14 was telling you stay calm. What was there to stay calm about?

15 A Well, there was a lot of excitement at that time about -- just the -- the
16 debates, like, they were just like -- he was -- I don't think he was -- said anything -- was
17 saying it at anything malicious or anything. He was just saying, like, hey, I support
18 people that, you know -- standing up for what they believe in, so he wasn't going to -- he
19 wasn't going to bend over to the -- to Joe Biden questioning him on a group that I don't
20 know if he knew about it or not.

21 He's unclear about it. He says he wasn't really familiar with the organization, so.
22 So, yeah, I don't think it was anything -- he just kind of said it, like, he needed to say
23 something, and he didn't -- he didn't want to say -- like, what else are you going to say?
24 I don't know. There's not too many options. He just said what he said at the moment.
25 He didn't want to denounce it, but he, you know, he wouldn't --

1 Q So you didn't take that as a sign of support from President Trump?

2 A I don't think he wanted --

3 Q I might be cutting out.

4 A I don't think he wanted to denounce, you know. I don't know what -- I
5 don't know what he was thinking. I don't know, you know, what he -- what his
6 knowledge is about particular things, but I don't think he -- he didn't want to denounce it
7 just to fall into the -- you know, if he would've denounced it, it would've -- he would've
8 been kind of bending over in a sense, and he's not that type of guy.

9 Q That makes sense. So I just have a couple more questions, and then I can
10 hand it back to [REDACTED]. And I guess one thing I was curious about throughout the
11 course of your conversation, was that you described the Proud Boys multiple times as a
12 social fraternity and a place where you could be with like-minded individuals and not
13 necessarily as a vehicle for political change.

14 And so I'm curious, why go to some of these events that had a lot of conversation
15 about, sort of, potential for conflict? One of your colleagues, your compatriots, got
16 stabbed, as we discussed earlier. Why go back? And you said you didn't have a stance
17 on whether the election was stolen, so why go to an event that was explicitly about a
18 stolen election where you knew there was a risk of violence? I guess I'm just curious as
19 to why.

20 A It's -- I'll go back to the -- the music festival analogy that you could go to a
21 festival and get trampled. You can go and somebody can -- can be aggressive and you
22 get hate or something or -- but for the most part, the environment, it's positive. You get
23 to see people give their presentation or speech on certain things, like that -- like I said,
24 the helicopter go flying over, I thought that was awesome, that was really nice to see.

25 That guy that got stabbed, I think a lot of it is his fault because he tweeted

1 something about come-and-get-me type of thing, and he ended up getting stabbed. So
2 that's -- that's on him.

3 But other than that, yeah, it's -- yeah, it's -- especially during a pandemic when
4 things are so boring and you can't even -- people are saying you can't go outside, it's nice
5 to go out and get some fresh air.

6 [REDACTED] Got it. Well, I guess I can hand it back to my colleague, [REDACTED]
7 for now, but thank you so much for taking the time to talk to me.

8 The Witness. No problem.

9 [REDACTED] Thanks.

10 BY [REDACTED]

11 Q So just one or two questions to finish up and then we'll be done here today.
12 I just wanted to ask about any efforts you made to locate documents that were
13 responsive to the subpoena that we sent you. And so one thing I wanted to do is
14 confirm, and I think you've already said this, but I just want to clarify for the record, did
15 you check your phone for the Telegram chats that we've discussed?

16 A I checked my phone for any type of communications. I don't have
17 anything.

18 Q Okay. And then the last thing, did you take any photos or videos when you
19 were at the Capitol?

20 A I took photos, but I don't have anything from -- from -- I don't have that. I
21 got a new phone. Every year or two I get a new phone, and I don't want to hoard
22 photos or anything. I just -- when I get a new phone, I -- I just treat it as a new phone.

23 Q Okay. So do you have -- do you have the old phone?

24 A I do.

25 Q Does that phone --

1 A But I don't --

2 Q -- any photos or videos from the 6th?

3 A I don't have -- I wasn't going to give it back to the -- I was going to sell it, but
4 then they told me that, from the crack, that it's not worth a lot. And I still have it, but
5 I -- I just -- I don't have anything on that phone.

6 Q Okay. Did you delete photos and videos that you took of the 6th?

7 A Well, when I was going to sell it, I just resetted it, and then I found out it
8 wasn't going to be worth a lot of money, so -- it has a nice camera, so I just kept it.

9 Q Okay. Okay. So all data has been wiped?

10 A Yeah. I don't have anything on that phone.

11 [REDACTED] All right. Then just while we're still on the record, I'll say thanks for
12 sitting down with us. We know it's not a pleasant process to revisit some of these things
13 and also just have these detailed questions asked of you. So I appreciate your patience
14 with us and also your being forthright with us and answering our questions. So thanks
15 very much, and that should be all that we have for you.

16 The Witness. All right. Thank you.

17 [REDACTED] We can put the deposition in recess, and we are off the record.

18 [Whereupon, at 2:39 p.m., the deposition was concluded.]

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Certificate of Deponent/Interviewee

I have read the foregoing ____ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Witness Name

Date